

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Bridie Delaney

Cooloo,

Moylough

Ballinasloe

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 01 November 2025

**Re: Observation/Submission to proposed wind energy development at Cooloo Wind Farm**

Location: Cloondahamper, Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally, Slievegorm  
- Co. Galway

Applicant: Neoen Renewables Ireland Limited

Dear Sir/Madam,

I live in the townland of Cooloo with my husband and two children for almost 20 years. It is a quite tranquil place to live with amenities easily assessable locally. We enjoy going for walks in the area proposed for the Cooloo Wind Farm and where they plan to have the 2 operational entrances. This will massively infringe on our way of life. My two teenage children, love the area and enjoy playing outdoors etc and have many friends in the area. This is where they have grown up and where they plan to live for the rest of their lives.

I am objecting to the proposed cooloo Wind Farm on the following grounds and i strongly request An Coimisiún Pleanála to refuse planning permission for this development

## **Reliance on outdated 2006 guidelines**

I object on the grounds that the continued reliance on the Wind Energy Development Guidelines 2006 is no longer appropriate given the significant evolution of wind energy technology.

The 2006 Guidelines were developed in an era when turbines were typically less than 100 metres in height

and generated 1-2 MW of power. The turbines in this proposed development will be 180 metres and produce approximately 6 MW of power. This will result in greater visual, acoustic, and environmental impacts than those contemplated in 2006.

The fact that the Wind Energy Development Guidelines 2006 has been acknowledged in the Dáil many times by many different people. In 2013 Deputy Michéal Martin told, the then Taoiseach, Enda Kenny that the guidelines were outdated and were never framed in the context of the new technology. Yet in 2025 Tánaiste Simon Harris is still saying in the Dáil that he acknowledges that the guidelines are outdated and that there is a specific commitment from the Government to prioritise the publication of new guidelines.

It is therefore unreasonable and contrary to the principles of proper planning and sustainable development for An Coimisiún Pleanála to continue to rely solely on the 2006 Guidelines. An Coimisiún Pleanála must make sure that any decision made is not based on outdated standards.

### **Right to peaceful enjoyment of property**

I object on the grounds that this development violates the right to peaceful enjoyment of property under the European Convention on Human Rights.

Article 1, Protocol 1 of the European Convention on Human Rights (ECHR) safeguards every individual's right to the peaceful enjoyment of their possessions. It provides that: "Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law."

Approval of this proposed wind farm would constitute a clear interference with this right. If the development proceeds, I will be deprived of the peaceful enjoyment of my home and property. The construction and operation phases would bring significant and continuous disturbance - including persistent noise pollution, low-frequency noise (LFN), shadow flicker, and heavy vehicle movements. The tranquillity and visual amenity of my surroundings, which form an intrinsic part of my home environment and well-being, would be irreversibly diminished.

During construction, the constant flow of heavy machinery and associated noise would cause ongoing disruption and stress, further impacting daily life. Once operational, the presence of industrial-scale turbines dominating the landscape would permanently alter the character of the area, stripping residents of the quiet enjoyment of their homes and lands. This level of intrusion cannot be considered proportionate or justified in the public interest, and therefore conflicts with the protections afforded under Article 1, Protocol 1 of the ECHR.

### **Property value impact - Outdated Studies**

I object on the grounds that the applicant's evidence regarding property value impacts is outdated, methodologically limited, and does not reflect the scale of modern wind turbines or local Irish conditions.

The applicant cites several studies to support the claim that wind turbines do not negatively affect house prices. However, many of these studies have significant limitations:

LBNL (2009) – The Impact of Wind Power Projects on Residential Property Values:

- Outdated and not reflective of current turbine scale or density
- Potential institutional bias noted by critics such as Michael McCann
- Underrepresents extreme cases of devaluation
- Hedonic pricing models may miss subtle or localized effects
- Selection bias: excludes homes that didn't sell due to turbine concerns

LBNL (2013) – Spatial Hedonic Analysis:

- Over a decade old
- Visual and auditory impacts not directly measured
- Buyers may not fully understand turbine impacts, muting price signals
- Homes withdrawn from the market are not captured

Energy Policy (2023) – New Evidence from U.S. Wind Projects:

- Homes within 1 mile lose approximately 11% value upon project announcement
- Urban bias: 72% of sample from urban counties
- Suggests compensation mechanisms and improved transparency

Patrick McHale (2023) – University of Galway: Found a statistically significant negative impact on house prices within 2 km of turbines in western Irish counties.

Lumify Energy (2025): Notes widespread homeowner concerns and reduced market appeal for homes near turbines, especially those with direct views or close proximity.

Michael S. McCann – Real Estate Appraiser:

- Value Decline: 25%–40% within 2 miles
- Unmarketable Homes: Especially within the turbine "footprint"
- Noise & Sleep Disturbance: Common within 1–2 miles
- Legal Framing: Describes turbine approval as "inverse condemnation"
- Local Impact: Estimated €6.5 million in lost value near Prairie Mills wind project

Given the scale and visibility of the proposed development, I respectfully urge the planning authority to:

- Consider the potential negative impact on property values based on current, local research
- Commission an independent valuation impact assessment specific to this locality
- Require the applicant to address the methodological limitations of the studies cited

### **Constitutional right to own and transfer property**

I object on the grounds that this development violates constitutional property rights guaranteed under Bunreacht na hÉireann.

Article 43.1.2 of Bunreacht na hÉireann provides that "the State accordingly guarantees to pass no law attempting to abolish the right of private ownership or the general right to transfer, bequeath, and inherit property." Granting permission for this wind farm development would effectively undermine this constitutional protection. Landowners and farmers within the affected area would face significant restrictions, as land situated near turbines would become unsuitable for residential development. This would prevent families from transferring land for the purpose of building homes for future generations, thereby eroding their practical rights of ownership and inheritance.

Furthermore, Article 43.2.1 acknowledges that the exercise of property rights must be regulated by the principles of social justice. However, this proposed development cannot be regarded as socially just. It disproportionately burdens local residents while providing little to no direct benefit to the community. Those of us living in the area would experience substantial and lasting impacts - including increased traffic and road closures during construction, ongoing noise pollution, shadow flicker, and significant visual intrusion on our landscape.

In addition, there remains insufficient scientific evidence to conclusively demonstrate that large-scale wind farms pose no long-term health risks to nearby residents. In these circumstances, permitting this development would be neither fair nor consistent with the principles of social justice recognised under Article 43.

### **Shadow flicker impacts**

I object on the grounds that the shadow flicker provisions in the Wind Energy Development Guidelines (2006) are outdated and insufficient for assessing the impacts of modern wind farms, particularly given the extraordinary scale of the proposed turbines.

The proposed turbines represent a dramatic escalation in size compared to those contemplated in 2006:

- Tip Height: 180 meters
- Rotor Diameter: 162 meters
- Hub Height: 105 meters
- Swept Area: Over 20,000 m<sup>2</sup> per turbine

These dimensions significantly increase the area affected by moving shadows, extending the reach and intensity of shadow flicker events. The 2006 Guidelines do not account for turbines of this magnitude, nor the cumulative impact of multiple units in close proximity to residential receptors.

The Guidelines permit up to 30 hours of shadow flicker per year at any dwelling. This threshold is:

- Arbitrary and unsupported by contemporary health research
- Uniformly applied without regard to turbine scale or proximity
- Silent on cumulative exposure from multiple turbines

No scientific basis is provided for the 30-hour limit, and no differentiation is made between single-turbine exposure and multi-directional flicker from clustered arrays.

Shadow flicker is often dismissed as a minor nuisance, yet growing evidence suggests more serious implications:

- Annoyance and Stress: The U.S. Department of Energy's WINDEXchange notes that even limited flicker can create persistent discomfort, especially during sensitive times of day
- Sleep Disruption: A 2013 report commissioned by the Scottish Government (University of Salford) found that shadow flicker may contribute to sleep disturbance and reduced sleep quality
- Photosensitive Epilepsy: Although rare, flicker frequencies between 3–30 Hz can pose risks. Complex interactions between blade movement, sun angle, and window geometry may approach sensitive thresholds
- Motion Sickness-like Symptoms: The ClimateXChange report noted symptoms such as dizziness and nausea linked to visual stimuli like flicker
- Mental Health and Quality of Life: A 2023 article by Fritz Energy documented community complaints about anxiety, reduced concentration, and general decline in wellbeing

The Guidelines make no distinction between general receptors and vulnerable groups (children, elderly, or those with neurological conditions). In ABP Case 318943, shadow flicker was cited as a material concern, particularly where receptors were located within 500m of turbines.

The 2006 Guidelines offer minimal direction on how shadow flicker should be assessed, modelled, or mitigated:

- No validated modelling standards: The Guidelines do not specify which modelling tools should be used, what input parameters are required, or whether worst-case scenarios should be assessed
- No cumulative impact assessment: There is no requirement to assess overlapping flicker events from multiple turbines, multi-directional exposure, or seasonal variation
- No mandated mitigation strategies: The Guidelines do not require automated curtailment systems, physical shielding, or real-time monitoring
- International best practice ignored: Germany mandates curtailment if flicker exceeds 30 minutes per day; Scotland recommends site-specific modelling; the Netherlands requires flicker-free zones around homes

I respectfully urge the planning authority to:

- Apply a precautionary approach given the outdated standards
- Require robust modelling accounting for cumulative impacts

- Mandate effective mitigation measures including automated curtailment
- Consider updated health research and vulnerable populations

References:

- Wind Energy Development Guidelines (2006) – Department of Housing, Local Government and Heritage
- ABP Case 318943 – Chapter 11: Shadow Flicker
- WINDEXchange – U.S. Department of Energy
- ClimateXChange – Report on Health Impacts of Wind Turbines (2013)
- Fritz Energy – Wind Turbines and Shadow Flicker (2023)

**Road disruption during construction**

I wish to object to the proposed development on the grounds of significant traffic and road safety impacts during construction, particularly in relation to abnormal load deliveries. The Traffic Management Plan (Appendix 15-2) lacks essential detail, including the number, timing and routing of heavy goods and turbine loads, and commitments to off-peak scheduling. Without clear and enforceable mitigation, there is a risk of damage to narrow rural roads, verges and drainage, along with conflicts between construction vehicles, farm traffic and school transport. No robust plan has been presented for road strengthening, maintenance or reinstatement. The absence of detailed community-specific measures leaves local access, amenity and safety inadequately protected. Until comprehensive information and binding commitments are provided, the proposal represents an unacceptable risk to road infrastructure and rural community wellbeing. Having roads closed for a combined 210 days (at a minimum) is unacceptable. It is also unacceptable for locals to have diversions of up to 13.7km per journey for the duration of this project.

**Conclusion**

In light of the serious concerns outlined above I respectfully urge An Coimisiún Pleanála to refuse permission for this development. The proposal is not compatible with the principles of proper planning or sustainable development. This proposal has also divided our community and in time, if this development is allowed to go ahead, it will destroy relationships within the community and no doubt have an impact on the population of the community.

Yours Sincerely,

Bridie Delaney

Name: Bridie Delaney

Date: 01 November 2025