

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Caoimhe Whyte

Trasternagh

Moylough

Ballinasloe

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 08 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 have lived in Trasternagh my whole life with my family in our family home. Turbine 9 will be only 765m from my home. This will mean that the turbine will cause noise pollution and shadow flicker on my home.

In addition to this my family home will be devalued as a result of the development.

It was my hope that in the future I would build a home and settle in Trasternagh to raise my family as I was raised. If the development goes ahead this will not be possible.

I currently enjoy being outdoors and walking around the land near my home. My enjoyment of my area will be greatly impacted by this development.

Community Consultation and Engagement

The basis that the community consultation process was carried out by Neoen and MKO for the proposed Cooloo Wind Farm has been fundamentally inadequate and does not meet the standards of meaningful public engagement required under the Draft Revised Wind Energy Development Guidelines (2019) or An Bord Pleanála's Strategic Infrastructure Development protocols.

The consultation was poorly publicised, using the Irish Examiner, a Cork-based paper with minimal reach in north-east Galway, for statutory notices instead of the Tuam Herald, the area's primary local newspaper. This choice deprived many residents of awareness and opportunity to participate.

Claims of engagement with "local groups, clubs and schools" are inaccurate. Key organisations such as Killarney Community Council and Killarney GAA received no correspondence or invitations to contribute. Furthermore, no public consultation meeting was held in Moylough, where seven of the nine turbines are proposed, further excluding the most affected residents.

Reported "door-to-door engagement" reached just 55 homes within 1 km of the turbines, yielding only ten written responses which is an unacceptably low level of participation for a project of this scale. Reliance on online materials was ineffective given poor broadband in the area.

Overall, the process was selective, poorly targeted, and misleading in its presentation of local engagement. These failings undermine the project's compliance with public participation standards and should be given significant weight in An Bord Pleanála's assessment.

Right to Own/Transfer Property

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.

Property Devaluation

A study from the University of Galway and international research indicates that homes within 1 km of wind turbines experience adverse effects on property value, with reductions of up to 14.7%. My home falls within this range, and I am deeply concerned about the financial and emotional impact this will have on my family and our future prospects. The planning application does not appear to address or mitigate this issue.

<https://www.universityofgalway.ie/media/researchsites/ceris/files/WP-2023-01.pdf>

Noise

Planning permission for the proposed Cooloo Wind Farm should be refused on the basis that it poses a clear and foreseeable risk of substantial interference with the normal use and enjoyment of nearby homes. In *Byrne & Moorhead v ABO Energy* [2025] IEHC 330, the Irish High Court found that wind turbine noise—specifically low-frequency and amplitude-modulated sound—constituted a private nuisance under common law, as it significantly disrupted residents' ordinary domestic life. The Court held that such noise amounted to an unreasonable and continuous intrusion, preventing the quiet occupation of the home and

resulting in the permanent shutdown of three turbines in County Wexford.

The Cooloo proposal relies on outdated ETSU-based noise criteria that fail to account for the same low-frequency and modulated noise effects found to cause substantial nuisance in the Wexford case. Given the proposed turbines' greater height and rotor size, the likelihood of these harmful acoustic effects occurring at Cooloo is even higher. Approving this development under obsolete standards would disregard the High Court's findings and expose local residents to predictable and legally recognized interference with their right to the peaceful enjoyment of their homes. Planning permission should therefore be refused in full on these grounds.

Shadow Flicker

The EIAR's treatment of shadow flicker fails to meet statutory and international standards for the assessment and mitigation of human health and residential amenity impacts. It relies on outdated guidelines, applies over-simplified modelling assumptions, and does not provide adequate protection to the large number of dwellings and receptors affected.

The EIAR confirms that:

- 218 residential receptors are located within 1.62 km of proposed turbines,
- 171 of these are predicted to experience shadow flicker, and
- 43 receptors are within 1 km of a turbine.

These figures demonstrate that the project is situated in a densely inhabited rural area, yet the assessment dismisses the significance of impact based solely on a theoretical model rather than verified site conditions.

By any reasonable measure, 171 dwellings affected by a rotating shadow intrusion constitutes a major residential amenity and public health concern, not a negligible effect.

The EIAR applies the 2006 DoEHLG Wind Energy Development Guidelines, which allow up to 30 minutes per day or 30 hours per year of shadow flicker at any dwelling.

However:

- The 2019 Draft Wind Energy Development Guidelines (and reiterated in the 2025 Climate Action Plan Annex) require that no occupied dwelling or sensitive receptor experiences any shadow flicker through the use of automatic turbine control systems.
- The EIAR itself acknowledges that turbine software could achieve this standard but chooses to assess impacts under the obsolete 2006 thresholds.

This approach is contrary to current best practice and fails to future-proof the development in line with national policy on renewable energy development and community protection. Although the EIAR cites various international studies (some over a decade old) claiming no proven medical link between shadow flicker and disease, it fails to address contemporary health guidance:

- The World Health Organisation (2018) recognises annoyance and sleep disturbance as legitimate health effects of environmental light and noise intrusions.
- The HSE's own scoping response (2023) requested an assessment of all likely significant impacts on sensitive receptors, including shadow flicker, along with proposed mitigation.
- The EIAR's discussion focuses on whether shadow flicker can cause seizures (which is rare), but ignores chronic stress, fatigue, and loss of amenity due to regular flicker events within residential interiors.

The result is a narrow and outdated view of human health inconsistent with EPA (2022) guidance, which defines health as "a state of complete physical, mental and social well-being."

The shadow flicker assessment in the Cooloo Wind Farm EIAR is deficient, outdated, and incomplete. It underestimates the true scale of residential intrusion and fails to apply the precautionary principle required

under both EU and Irish environmental law.

Given:

- 171 dwellings predicted to experience flicker
- Outdated 2006 guideline thresholds
- Absence of enforceable mitigation and cumulative analysis

this development cannot be deemed to have no likely significant effect on human health or amenity.

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.

Climate impact

I object to the proposed Cooloo Wind Farm because it would damage Ireland's ability to meet its climate targets under the Climate Action and Low Carbon Development Act 2021. By excavating peat and clearing mature forest, this project will release large amounts of stored carbon and increase emissions from the Land Use, Land Use Change and Forestry (LULUCF) sector, which is already a major source of greenhouse gases. Under the law, all public bodies must act consistently with national carbon budgets. Allowing a development that worsens LULUCF emissions contradicts that duty and the EU 'no debit' rule under Regulation (EU) 2018/841. Renewable energy projects are important, but they should not come at the cost of destroying carbon-rich habitats or undermining Ireland's long-term environmental obligations.

Conclusion

For all of the reasons set out in this submission, it is clear that this windfarm would cause more harm than benefit to our area. This community values its peace, safety, and way of life. The proposed windfarm threatens all of these. I ask An Coimisiún Pleanála to listen to the genuine concerns of local people and to reject this development in the interest of protecting our environment, our homes, and our future.

If permission is not refused outright, I request that an oral hearing be held so that I as a local can have my concerns about this development heard.

Yours Sincerely,

C Whyte

Name: Caoimhe Whyte
Date: 08 November 2025