

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

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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 am objecting to this industrialised windfarm development due to the close proximity of turbine 9 and 8 to my home and land. Turbine 9 will be 730 metres from my house. I am objecting also for the health impacts this windfarm development will have due to operational noise and shadow flicker as well as the dust and noise generated during construction. I am objecting also because we will be denied our right to enjoy our home that we have put our lifetimes work into and also denying our children the right to build on our land.

**Reliance on outdated 2006 guidelines**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 In 2013 Deputy Michéal Martin told, the then Taoiseach, Enda Kenny that the guidelines were outdated and were never framed in the context of the new technology. Yet in 2025 Tánaiste Simon Harris is still saying in the Dáil that he acknowledges that the guidelines are outdated and that there is a specific commitment from the Government to prioritise the publication of new guidelines.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 An Coimisiún Pleanála must make sure that any decision made is not based on outdated standards.

### **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)

### **Impact on neurodiverse community members**

I object on the grounds of serious harm to neurodiverse individuals, including those with autism, ADHD, and sensory processing disorders.

Numerous studies and planning inspectors with An Coimisiún Pleanála have acknowledged that wind turbines can have negative effects on neurodiverse individuals. Research by Howell (2015) found that people with autism are more sensitive to environmental noise, experiencing higher rates of sleep disturbance, cognitive difficulties, and stress due to low-frequency noise (LFN). The neurodiverse community often struggles to filter background sounds, and constant turbine noise and vibration could cause pain, anxiety, and loss of concentration, reducing quality of life.

These impacts extend to education. Local schools and preschools, including Brierfield National School which has a special class for children with autism, would be particularly affected. Senior planning inspectors have previously noted that facilities for children with additional educational needs may become unviable near large-scale wind farms due to such disturbances.

Shadow flicker poses further risks, as studies (Becchio et al., 2010) show that individuals on the autistic spectrum may fixate on spinning movements, heightening distress. Those with epilepsy or neurological conditions may also be affected.

Ireland's obligations under the UN Convention on the Rights of Persons with Disabilities require protection from harm and equal enjoyment of rights. Allowing this development would contradict those principles.

While more research is needed, there is no definitive evidence proving that wind farms are safe for, and do not significantly impact, the neurodiverse community - and the absence of evidence is not evidence of absence.

References:

- An Bord Pleanála (2016) PA0041 - Assisting report to Senior Inspector
- An Bord Pleanála (2015) Inspector's report: ABP-PA0038
- Howell, G. (2015) Autism and the effect of introducing a new noise source into quiet rural communities

- Becchio C, Mari M, Castiello U (2010) Perception of Shadows in Children with Autism Spectrum Disorders

### **Impact on national schools**

The presence of wind turbines near schools can have a range of impacts on students, staff, and the overall learning environment. Wind turbines produce both audible noise and low-frequency infrasound, which can be noticeable inside buildings, causing distraction. This constant distraction will interfere with children's attention and overall cognitive performance, making it more difficult for students to focus on learning.

- Cooloo NS is 1.59km away from the nearest wind turbine
- Brierfield NS is 1.35 km away from the nearest wind turbine
- Barnaderg NS is located approximately 2.49 km from the nearest wind turbine

In addition, shadow flicker caused by rotating turbine blades can create intermittent light in classrooms, which can be distracting and, in some cases, uncomfortable or stressful for children.

The noise and shadow flicker will also greatly impact on the children in the school who have an additional need. There is a lack of research to state the impacts on these children.

In addition to the above, during the construction phase and while laying the cabling, the roads will experience increased traffic and road closures. This will impact on children travelling to and from school.

While the severity of these impacts depends on distance from the turbines, it is clear that wind turbines in close proximity to schools have the potential to disrupt learning, reduce student wellbeing, and interfere with the overall educational experience.

### **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.

### **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) protects 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."

Granting permission for this wind farm development would seriously interfere with my right to the peaceful enjoyment of my property as a landowner and farmer. My land is not only my livelihood but also my home and heritage, and its value lies in its usability, productivity, and tranquillity. The construction and operation of large-scale wind turbines would bring constant noise, vibration, and shadow flicker, making it extremely difficult to work or live on the land without disruption.

During the lengthy construction period, the constant movement of heavy machinery, road congestion, and elevated noise levels would disturb livestock, damage rural roads, and make normal farm operations significantly harder to carry out. Once operational, the turbines would permanently alter the landscape, impacting both animal welfare and the environment in which I work daily. The cumulative effects of noise, flicker, and visual dominance would deprive me of the peaceful enjoyment and practical use of my land.

Such disruption cannot reasonably be regarded as proportionate or justified in the public interest, and therefore would constitute a breach of the protections guaranteed under Article 1, Protocol 1 of the ECHR.

### **Impact on property value**

I object on the grounds of significant and documented property value loss for homes within 1km of wind turbines.

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.

For many families, their home represents their largest financial asset and a key component of their retirement planning or their children's inheritance. A reduction of up to 14.7% in property value represents a substantial financial loss that could undermine years of mortgage payments and home improvements.

The planning application provides no mechanism for compensating homeowners for this proven loss in property value. This represents an unjust transfer of wealth from local residents to the developer and raises serious questions about fairness and social justice.

Reference:

University of Galway CERIS Working Paper WP-2023-01

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

### **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

### **Impact on farming community**

I object on the grounds of serious impacts on the farming community in Barnaderg, Cooloo, and surrounding areas.

I am deeply concerned about the impact this proposed windfarm will have on the farmers in Barnaderg, Cooloo, and the surrounding areas. Many of these are full-time and part-time dairy and dry-stock farmers, with holdings of varying sizes, and their livelihoods depend directly on the health and productivity of their animals. Farming in this area is not just a way to make a living - it is a way of life, a source of pride and satisfaction.

Farmers rely heavily on the local roads for moving cattle and accessing their land every day. These essential activities could be disrupted by construction traffic, turbine maintenance, or other project-related impacts, further jeopardizing livelihoods. Also the presence of shadow flicker, excessive noise, and visual intrusion from turbines would seriously disrupt this, affecting both our work and our well-being.

### **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**

As a local farmer, I am deeply concerned that the Cooloo Wind Farm will lead to further peat drainage and the felling of productive forest land. This will increase national land-use emissions and make it harder for Ireland's agriculture and forestry sectors to stay within their climate ceilings. Under the Climate Action and Low Carbon Development Act 2021, every sector must remain within its own emission limits. Projects that raise LULUCF emissions add to future pressure on rural landowners, who may face restrictions such as mandatory rewetting or livestock reductions to make up the shortfall. This proposal benefits energy targets but harms the land sector and undermines fair burden-sharing under national climate law.

### **Major accidents and natural disasters**

I object on the grounds that Chapter 16 of the Cooloo Wind Farm EIAR fails to provide a robust assessment of major accident and natural disaster risks.

The report's references to peat instability and raised-bog cutover are inadequate given the known susceptibility of peat landscapes to movement and sediment release during heavy rainfall or storm surge events. The EIAR's reliance on generic statements about low geological risk neglects the amplified high-wind, flood and peat-fire hazards forecast for County Galway under the local authority climate plan.

The lack of detailed modelling of flood-pathways or worst-case scenario storm events undermines the precautionary principle embedded in Irish planning law. This is a serious deficiency given the scale of the proposed development and the sensitivity of the peat landscape.

No explicit contingency or evacuation measures are detailed for the community along the grid-route corridor — a serious omission when tall turbines and infrastructure could present hazard in extreme events.

The assessment is incomplete and fails to satisfy the legislative requirements of an EIAR insofar as it must identify, describe and assess direct and indirect effects of the development on the environment and human beings.

I call on An Coimisiún Pleanála to require an independent supplementary risk assessment, specific to peat-hazard, flood-modelling and major-accident scenarios, before any decision is made on this application.

#### **References:**

- Galway County Council (2024) Local Authority Climate Action Plan 2024-2029
- Environmental Protection Agency (EPA) (2022) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EIAR)
- European Commission (2024) Environmental Impact Assessment: Overview of EU Rules

### **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,

Catherine  
Whyte

Name: Catherine Whyte

Date: 01 November 2025