

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Kathleen Hession

Trasternagh

Moylough

Ballinastoe

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 Trasternagh all my life. Tubine No 9 of the proposed Cooloo Wind Farm will be 920 meters from my property. I live with my partner Gerry and Trasternagh and the surrounding areas are a lovely tranquil part of the countryside to reside in.

If this development was to go ahead, our lives would be affected dramactially for the worst. Our views will be obscured by these massive 185 meter tall turbines. They will massively infringe on our lives as well as the habitat of the wild life in the surrounding areas. It will also have an erosion of the landscape and our bogs.

I strongly object to the proposed development of Cooloo Wind Farm on the following grounds and I request that An Coimisiún Pleanála 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Reliance on outdated 2006 guidelines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 In 2013 Deputy Michéal Martin told, the then Taoiseach, Enda Kenny that the guidelines were outdated and were never framed in the context of the new technology. Yet in 2025 Tánaiste Simon Harris is still saying in the Dáil that he acknowledges that the guidelines are outdated and that there is a specific commitment from the Government to prioritise the publication of new guidelines.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.

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 m² 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 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>

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.

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 and would have lasting negative effects on local residents, farmers, and the wider community. I therefore strongly object to this proposal and ask that it be refused in full.

Yours Sincerely,

Kathleen Hession

Name: Kathleen Hession

Date: 01 November 2025