

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Pat McKeogh
Ryehill
Abbeyknockmoy
Tuam
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 Ryehill Abbeyknockmoy with my wife Eileen. I am originally from Cooloo and own Bog there. My daughter and her family currently reside in Cooloo in the family home and we are very concerned with the proposed Cooloo Wind Farm Development. The family home is 1.45km away from Turbine No8. I spent my childhood in Cooloo cutting and saving turf and helping neighbours with their farming activities. It was a wonderful childhood and a beautifully peaceful place to grow up.

I strongly object to the development of Cooloo Wind Farm which will destroy the townland I grew up in and the surrounding areas. I request that An Coimisiún Pleanála refuse planning for this development.

I am objecting to this development for the following reasons

Reliance on outdated 2006 guidelines

I object on the grounds that relying on the Wind Energy Development Guidelines 2006 is no longer appropriate given significant technological advances.

Since their publication, wind energy technology has advanced significantly, and scientific understanding has deepened. The 2006 Guidelines were based on turbines under 100 metres and 1-2 MW in capacity, whereas the proposed turbines will be 180 metres tall and produce around 6 MW, causing greater impacts.

The outdated nature of these guidelines has been acknowledged in the Dáil multiple times. In 2013, Deputy Micheál Martin noted that the guidelines did not reflect modern technology, and in 2025, Tánaiste Simon Harris confirmed that the Government prioritizes the creation of new guidelines.

Therefore, it is inappropriate for An Coimisiún Pleanála to base decisions solely on the 2006 Guidelines. Decisions must reflect current technology and environmental standards.

Risk to Mid Galway water supply

I use the water from the Mid Galway Public Water Scheme as my main source of drinking water for my household. I am very concerned that pollution of various types such as silt, sediment and other contaminants will enter the water source, causing me and my family harm. With the location of two Turbines within the Source Protection Area (SPA) I believe the Cooloo Windfarm should not be granted permission whatsoever, especially in such a highly karstified and hydrologically sensitive area.

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)

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) 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."

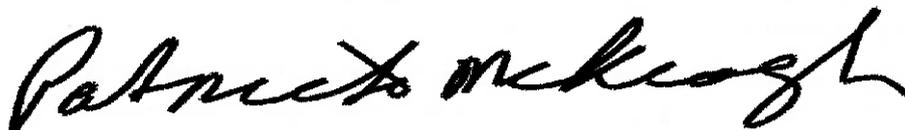
Approval of this proposed wind farm would constitute a clear interference with this right. If the development proceeds, I will be deprived of the peaceful enjoyment of my home and property. The construction and operation phases would bring significant and continuous disturbance - including persistent 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

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.

Yours Sincerely,

A handwritten signature in black ink, reading "Pat McKeogh". The signature is written in a cursive, slightly slanted style.

Name: Pat McKeogh

Date: 01 November 2025