OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Adrian

Greaney

Lisavalley

Barnaderg

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 15 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,

My name is Adrian Greaney. I live in Lissavalley and have lived there all my life. I am very concerned about a number of issues that may arise should this develop proceed. My main concern is the disruption that will be caused to the R332, the road I use multiple times a day for work and social purposes. The R332 is a restricted road and which means that people have been unable to get planning permission to build a home along that route. I cant understand how a development this big, which will have huge traffic volume of HGVs etc should be allowed to proceed. I am also concerned about impact this development may have on our local water scheme, and that of Briarfield and Mid Galway. I understand that construction at the site may result in water disruption and/or contamination. I am concerned about the impact 9 huge turbines will have on the welfare of my cattle. I am concerned about the wake effect, that will reduce grass growth potential of my land which is in close proximity to this development. I am concerned about the amount of dust and residue that will be created along the R332, and the site. I am worried about increased volume of HGVs as my parents live on the R332, and an increased volume of traffic will increase risks for road users.
I have outlined my concerns below, and I would urge An Coimisiun Pleanala to refuse permission for this development

Community Consultation and Engagement

The consultation led by Neoen and MKO for the Cooloo Wind Farm was deeply flawed and misleading. It does not meet the standards of genuine public engagement expected by An Bord Pleanála.

Notices appeared in the Irish Examiner while the Tuam Herald, the community's main news source, was ignored.

There was only a single public consultation meeting which was held outside Moylough, even though seven of nine turbines are proposed there. The plans have also changed significantly since this original meeting.

Despite claims of outreach to community groups, neither Killererin Community Council nor Killererin GAA were consulted. Only 55 homes were visited during 'door-to-door' engagement and ten written responses were received which is evidence of a process that failed to inform or involve the community. With poor broadband limiting access to online materials, and many residents not having the skills or technical knowledge to access online content, many locals were effectively excluded.

This was not meaningful consultation but a box-ticking exercise which did not provide the community with a fair chance to participate. These failures must carry serious weight in An Bord Pleanála's consideration of the application.

Barnaderg Gortbeg Group Water Scheme

I use the water from Barnaderg Gortbeg Group Water Scheme as my main source of drinking water for my household. The water is of excellent quality and 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 karsified and hydrologically sensitive area.

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.

National Schools

I am concerned that the presence of the wind turbines so close to the three local schools will have an impact on students, staff and the overall school community. All of the schools are less than 2.5 km away from a turbine. Turbines are known to create noise, low frequency infrasound and shadow flicker. These issues will no doubt impact on the students in the local schools.

Also during the construction phase and while laying the cabling, the roads will experience increased traffic and road closures. This will impact children travelling to and from school. I am also concerned that if Cooloo Wind Farm is granted planning permission less people will be moving to or building in the area. This will lead to fewer children in the community and may lead to schools losing teachers, and ultimately school closures.

Barnaderg National School

Barnaderg National School is located approximately 2.49 km from Turbine No 1.

The turbines being this close to the school will no doubt have an impact on the education of the children in Barnaderg NS. The school will suffer from noise pollution and infrasound. In addition to this, during the construction phase and while laying cabling the roads to and from the school will be impacted by road closures, traffic, additional noise and dust. Again, all of this will impact on the children of the school.

I am also concerned that if t planning permission is granted less people will be moving to or building in the area of Barnaderg. This will lead to fewer children in the community and may lead to the school losing teachers, and ultimately the school closure.

Farming

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. The presence of shadow flicker, excessive noise, and visual intrusion from turbines would seriously disrupt this, affecting both our work and our well-being.

Scientific research underscores this concern. The study - 'Importance of Noise Hygiene in Dairy Cattle Farming – A Review (Dimov, Penev & Marinov, 2023)' highlights that exposure to noise and vibration—even from sources like a milking parlour—can reduce milk yield, lower milk quality, and stress the animals. Turbine noise represents a new, unfamiliar source that could have similar or worse effects on livestock.

Additionally, the developer has not addressed the practical realities of farming life. 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. For these reasons, I strongly object to the proposed windfarm.

Reference:

Dimov, D., Penev, T., and Marinov, I. (2023) 'Importance of Noise Hygiene in Dairy Cattle Farming – A Review'. Featured Position and Review Papers in Acoustics Science.

Available at: https://www.mdpi.com/2624-599X/5/4/59.

Extra construction traffic

I strongly object to this proposal due to the major disruption and safety risks it poses to our local community during the construction phase. The Traffic Management Plan fails to provide clear information on delivery schedules, routes or mitigation for abnormal turbine loads. Our rural roads are narrow, shared by farm

machinery, school buses and local traffic, and cannot safely accommodate such heavy haulage without damage or obstruction. The application states that there will be approximately 14 extra return trips made by trucks carrying materials. This is vastly underestimated for a project of this size. There are no binding guarantees on road repairs, traffic management or timing of deliveries to avoid peak community use. Residents, farms and schools in Barnaderg, Cooloo and surrounding areas will face delays, dust, noise and restricted access. This plan does not adequately safeguard community safety, local livelihoods or the integrity of rural infrastructure. Permission should not proceed without full, enforceable traffic controls and local protection measures.

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.

Battery storage and substation safety risks

I object on the grounds of unacceptable risks to public health, fire safety, and water contamination posed by the proposed substation and Battery Energy Storage System (BESS).

The developer's own Appendix 12-3 Battery Storage Noise Assessment (Sept 2025) identifies fifteen CATL EnerC+ battery containers containing lithium-ion (LiFePO4) systems manufactured by CATL. Predicted operational noise levels reach up to 31 dB LAeq at nearby homes, representing an increase of +11 to +14 dB above background levels. The report itself classifies this as a "significant adverse impact" on residential amenity. Scientific research shows that chronic noise above 30 dB can raise risks of cardiovascular disease and sleep disturbance.

Lithium-ion Battery Energy Storage System (BESS) installations worldwide have experienced fires and explosions that release toxic gases such as hydrogen fluoride and hydrogen cyanide. Research shows that fire-water run-off from lithium-ion battery fires can contain hydrofluoric acid, dissolved metals, and fluorinated organic compounds, which may contaminate nearby soil and waterways if not properly contained.

This proposed Substation and BESS would have a major impact on The Lough Corrib Special Area of Conservation, as a nearby stream eventually flows into Lough Corrib, potentially harming aquatic life and drinking water sources.

Based on the absence of any Fire Safety Management Plan within Appendix 12-3, it appears that nearby fire services are not equipped or trained to respond effectively to large-scale lithium-ion battery fires.

In Grace & Others v. An Bórd Pleanála (2017), the Supreme Court ruled that a residence within one kilometer of a proposed development site had standing to argue against consent. This case emphasizes the significance of thoroughly evaluating related infrastructure such as the substation and BESS, which ought to be included in the same consenting procedure as the wind farm itself.

With homes, farmland, and livestock within a few hundred metres of the proposed site, this industrial-scale development poses an unacceptable risk to community health, safety, and environmental integrity. Until independent noise, fire-safety, and hydrological risk audits are completed and verified by competent authorities, I urge An Bord Pleanála to refuse this application in accordance with the Precautionary Principle.

References:

- National Fire Protection Association (NFPA) (2020) Hazard Assessment of Lithium-Ion Battery Energy Storage Systems
- TNEI Ireland (2025) Appendix 12-3 Battery Storage Noise Assessment
- World Health Organization (WHO) (2018) Environmental Noise Guidelines for the European Region
- Irish Legal News (2017) Supreme Court: Challenge to wind farm development referred to CJEU

Bird collision risk

I object to the proposed development on the grounds that the Collision Risk Assessment (Appendix 7-6, MKO 2025) is methodologically and scientifically inadequate to protect legally protected bird species.

The assessment relies on the theoretical Band Model, which assumes fixed avoidance rates and static behaviour, without validation using telemetry or local field data. Survey coverage is temporally and spatially limited, missing key migration and nocturnal flight periods. This approach fails to capture the real-world behaviour of birds in the area.

The use of a 99.5% avoidance rate for Whooper Swans, without local validation, significantly underestimates the risk of collision. Evidence from Irish Wetlands Bird Survey (I-WeBS) and BirdWatch Ireland indicates that Whooper Swans routinely commute between Horseleap Lough and surrounding feeding areas at low altitudes that overlap turbine rotor heights. The conclusion of 'negligible risk' is therefore unsupported and unreliable.

The report fails to consider cumulative impacts with other regional wind farms or infrastructure, contrary to EU Directive 2009/147/EC (Birds Directive) and Article 6(3) of the Habitats Directive. This is a serious omission given the presence of multiple wind energy developments in the region.

Mitigation measures are undefined and untested. Key figures such as flightline maps (e.g., Figure 7-6-1) are omitted, hindering independent review and transparency. Without clear, evidence-based mitigation strategies, there is no guarantee that collision risks can be managed effectively.

Under the Birds Directive (2009/147/EC) and the Habitats Directive, Ireland has a legal obligation to protect migratory and resident bird populations. The assessment as presented does not provide sufficient evidence that these obligations can be met.

I respectfully request that the planning authority reject or defer this application pending an independent, peer-reviewed reassessment. This should include:

- Full telemetry and radar data for local bird populations
- Expanded seasonal coverage including migration and nocturnal periods
- Transparent disclosure of all field survey data and model assumptions
- Cumulative impact assessment with regional wind farms
- Defined, evidence-based mitigation strategies

References:

- MKO (2025). Appendix 7-6 Collision Risk Assessment, Cooloo Wind Farm EIA
- Band, W., Madders, M. & Whitfield, D. (2007). Developing field and analytical methods to assess avian collision risk at wind farms
- Scottish Natural Heritage (2018). Avoidance Rates for the Onshore Wind Farm Collision Risk Model
- NatureScot (2021). Research Report 909: Using a collision risk model to assess bird collision risks onshore wind farms
- Rees, E. (2006). Whooper Swans: Biology and Conservation. T & AD Poyser
- Crowe, O. et al. (2019). Migration and Roosting of Whooper Swans. Irish Birds 43
- BirdWatch Ireland (2024). Whooper Swan Species Profile & Irish Wetlands Bird Survey (I-WeBS)
- European Commission (2021). Wind Energy and Natura 2000

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.

If permission is not refused outright, I request that an oral hearing be held so that local residents, farmers, and the wider community can have our say on the impacts of this development.

Yours Sincerely,

Name: Adrian
Date: 15 November 2025