

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Adrian Nevin

Lecarrow

Brierfield

Moylough

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,

I Adrain, farm land very close to the proposed wind farm development site. Myself and my Dad own land that will be less than 500 metres from turbine 1. We also own land that will be less than 700m from turbine 2 and 3.

Four generations of my family have farmed this land. I had hoped to pass on the farm to future generations. But if this development goes ahead our land will be unviable because of the proximity to a number of the turbines. I fear that my own children won't be able to build on our family land which is in extreme proximity to the site, specifically turbine 1.

I also have bog which will be very close to turbine 6. I am concerned about how I will access my bog as a result of the development. I am very concerned about flooding of my bog as a result of the loads of fill and concrete that will be used for the bases of the turbines and the floating road. This will impact my bog without a doubt.

On top of all of this I will be subjected to daily noise pollution, LFN and shadow flicker as I farm the land. I enjoy being on the land and have grown up on this land. This development would ruin my enjoyment of the land, and that is unacceptable.

My house will be 1.2km from turbine 1, 1.3km from turbine 2 and less than 1.9km from turbine 3 and 4. This will mean that my family and I will be subjected to noise, LFN and shadow flicker daily in our home. My home

will also be devalued as a result of the development.

The following are the reasons I object to this proposed 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 Killarinerin Community Council and Killarinerin 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.

Planning Framework and Guidelines

The ongoing reliance on the Wind Energy Development Guidelines 2006 is increasingly inappropriate given the advancements in wind energy technology almost twenty years ago. At the time, turbines rarely exceeded 100 metres in height and produced 1–2 MW of power. In contrast, the turbines proposed in this development will reach 180 metres and generate approximately 6 MW, resulting in significantly greater impacts than those envisaged by the 2006 Guidelines.

These guidelines have repeatedly been acknowledged in the Dáil as outdated. In 2013, Deputy Micheál Martin informed then-Taoiseach Enda Kenny that the guidelines did not account for contemporary technology. In 2025, Tánaiste Simon Harris reiterated in the Dáil that the guidelines remain outdated.

Accordingly, it is unreasonable and inconsistent with principles of proper planning and sustainable development for An Coimisiún Pleanála to rely solely on the 2006 Guidelines. Any decision must be informed by current standards and technological realities.

Mid Galway Public Water Scheme

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 karsified and hydrologically sensitive area.

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

It is fair to surmise that people will not want to live near an industrial wind farm. There is growing evidence of loss of value and depreciation in the marketability of houses which are located near wind farms. The knock-on effect is that people will not move to the area or the local schools, and the community will wither. Rural Ireland still has a strong thriving support network of neighbours and community which will fundamentally be put at risk by imposing an industrial wind farm in the midst of 400 homes.

Noise

The proposed Cooloo Wind Farm should be refused planning permission, citing the Irish High Court case *Byrne & Moorhead v ABO Energy* [2025] IEHC 330, in which wind turbine noise was legally recognized as a private nuisance, leading to the permanent shutdown of turbines in County Wexford. The objection highlights that the Cooloo proposal fails to address proven low-frequency and amplitude-modulated noise impacts similar to those measured in the Wexford case, where sound levels far exceeded safe limits and caused serious disturbance to residents living over a kilometre away. The Cooloo project’s reliance on outdated ETSU-style noise standards, which disregard low-frequency and tonal effects, is therefore deemed inadequate to protect public health and residential amenity.

The proposed turbines at Cooloo—significantly larger than those involved in the Wexford case—are likely to generate even stronger low-frequency noise that travels farther and fluctuates more intensely under local atmospheric conditions. This increases the risk of nuisance and potential legal liability for both developers and planning authorities. Ireland’s 2006 wind energy guidelines are outdated and fail to reflect modern scientific understanding of turbine acoustics. Until revised national standards are adopted, approving large-scale wind farms under obsolete criteria would be unsafe and contrary to the public interest. Planning permission should therefore be refused due to the clear and foreseeable risk of harm to residential amenities, the inadequacy of current noise controls, and the legal precedent confirming wind turbine noise as a substantial nuisance.

Shadow Flicker

Similar to noise, shadow flicker caused by turbines would be similar to living with a faulty light bulb during the day, and at night, with flashing red lights. Residents have a right to live in their homes without unreasonable interference. The UN Convention on Human Rights guarantees that people will not be subjected to arbitrary

interference to their homes or family.

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, which can cause a 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 3.49 km from the nearest wind turbine.

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 impact 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 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.

Brierfield National School

Brierfield National School is 1.35 km away 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 Brierfield NS. The school will suffer from noise pollution, infrasound and shadow flicker. 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.

Brierfield NS also has a special class for children with Autism. These children process noise and light differently to other children. The noise, infrasound and shadow flicker will no doubt impact on their daily lives in school.

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

Farming

There are dairy and dry-stock farmers in Barnaderg, Cooloo and the surrounding areas, both full-time and part-time. Holdings vary in size. Many of these farmers depend on their livestock performing well in order to pay their bills. Also, those who are farming in the area enjoy the work they do, in the absence of shadow flicker, noise or visual pollution. If this development is granted their livelihoods will be impacted.

The 'Importance of Noise Hygiene in Dairy Cattle Farming – A Review' (Published November 1st of 2023 by Dimo Dimov, Toncho Penev and Ivaylo Marinov) details how vibration and noise from a milking parlour can negatively impact the milk yield and milk quality of a dairy cow. The paper also discusses how exposing animals to noise from an unfamiliar source can cause them stress.

It is also important to note that the developer has not taken into account the ways in which farmers depend

on the local roads for moving cattle and for access to their land when going about their daily tasks within their farms.

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>.

Biodiversity Impact - Bats

I object on the grounds that the assessment of bat mortality risk is inadequate and fails to meet current scientific standards for acoustic monitoring and mitigation.

Wind turbines are well-documented sources of bat mortality through collision and barotrauma. Recent peer-reviewed research by Behr et al. (2023, *Mammal Review*, 53: 65–71) confirms that bat fatalities can be reliably estimated only where standardised, referenced acoustic monitoring protocols are applied. The Cooloo Wind Farm EIA does not demonstrate compliance with these standards.

- No evidence of standardised, referenced acoustic monitoring at nacelle level
- Ground-level acoustic surveys and short-term transects are insufficient and cannot predict turbine-specific collision risk
- The proposed tall, large-rotor turbines increase collision risk and monitoring uncertainty
- No commitment to validated curtailment systems (such as ProBat) which have been shown to substantially reduce bat mortality
- Absence of site-specific validation and continuous monitoring means bat fatalities may be severely underestimated

Under the EU Habitats Directive (Articles 12 and 16) and the Wildlife Acts 1976–2018, all Irish bat species are strictly protected. Developers and planning authorities have a legal duty to ensure projects do not result in deliberate killing or disturbance of bats or deterioration of their breeding or resting sites. The absence of scientifically robust, standardised acoustic monitoring represents a significant procedural and ecological shortcoming.

I respectfully request that An Coimisiún Pleanála require:

- Standardised, referenced acoustic monitoring following international best practice
- Nacelle-mounted, calibrated detectors to monitor bat activity continuously throughout operation
- Validated curtailment systems (e.g. ProBat) to automatically shut down turbines during high bat activity
- Independent review and public reporting of all monitoring protocols and data
- Precautionary curtailment during high-risk seasons until adequate local reference data are available

Reference:

- Behr, O., Brinkmann, R., Mages, J., Niermann, I., Korner-Nievergelt, F., & Voigt, C. C. (2023).

Standardised and referenced acoustic monitoring reliably estimates bat fatalities at wind turbines. *Mammal Review*, 53(1), 65–71. <https://doi.org/10.1111/mam.12302>

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.

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

Visual Impact

The proposed turbines would be highly intrusive and visually dominant, overwhelming the existing rural character of the local landscape. Their visibility from multiple vantage points would transform a natural and agricultural setting into an industrial-scale development.

The proposal is out of scale with the surrounding environment. The turbines' extreme height and size would cause visual clutter and a loss of scenic amenity, remaining visible even at long distances and creating continuous visual intrusion.

When combined with existing or approved wind farms in the region, this development would lead to visual saturation and skyline dominance, further eroding the landscape's character and reducing its recreational value.

The developer's visual impact assessment understates the visibility and significance of the turbines. Photomontages appear selective and fail to represent the true extent of visual intrusion likely to be experienced by residents and visitors.

The proposal would diminish the rural amenity, tranquillity, and identity of the local region. It threatens the area's sense of place and the quality of life for residents who value the natural and agricultural landscape.

The local wind farm's size and visual impact are excessive and inconsistent with the character of the area. While supporting renewable energy, developments must respect the local landscape — this project does not. The proposal should therefore be refused on the grounds of unacceptable visual and landscape impacts.

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,

Adrian Nevin

Name: Adrian Nevin
Date: 15 November 2025