

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Aideen and Christopher Smyth

Cloonboo More

Lavally

Tuam

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 07 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'd like to object to the proposed windfarm at Cooloo. Our family home and farm are located next to Turbine 7 and we are approximately 1.5km from this turbine. Our eldest daughter is under the continued care of Crumlin Cardiology due to POTS Syndrome and requires heart medication twice daily. She also suffers with severe migraines and requires medication twice daily. We are extremely worried as parents that this development will further exacerbate her symptoms due to shadow flicker, the rotation of the blades causing disorientation and from noise pollution due to the 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 Killereerin Community Council and Killereerin 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.

Right to Peaceful Enjoyment of Property

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.

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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.

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.

Shadow Flicker

The EIAR's treatment of shadow flicker fails to meet statutory and international standards for the assessment and mitigation of human health and residential amenity impacts. It relies on outdated guidelines, applies over-simplified modelling assumptions, and does not provide adequate protection to the large number of dwellings and receptors affected.

The EIAR confirms that:

- 218 residential receptors are located within 1.62 km of proposed turbines,
- 171 of these are predicted to experience shadow flicker, and
- 43 receptors are within 1 km of a turbine.

These figures demonstrate that the project is situated in a densely inhabited rural area, yet the assessment dismisses the significance of impact based solely on a theoretical model rather than verified site conditions.

By any reasonable measure, 171 dwellings affected by a rotating shadow intrusion constitutes a major residential amenity and public health concern, not a negligible effect.

The EIAR applies the 2006 DoEHLG Wind Energy Development Guidelines, which allow up to 30 minutes per day or 30 hours per year of shadow flicker at any dwelling.

However:

- The 2019 Draft Wind Energy Development Guidelines (and reiterated in the 2025 Climate Action Plan Annex) require that no occupied dwelling or sensitive receptor experiences any shadow flicker through the use of automatic turbine control systems.
- The EIAR itself acknowledges that turbine software could achieve this standard but chooses to assess impacts under the obsolete 2006 thresholds.

This approach is contrary to current best practice and fails to future-proof the development in line with national policy on renewable energy development and community protection. Although the EIAR cites various international studies (some over a decade old) claiming no proven medical link between shadow flicker and disease, it fails to address contemporary health guidance:

- The World Health Organisation (2018) recognises annoyance and sleep disturbance as legitimate health effects of environmental light and noise intrusions.
- The HSE's own scoping response (2023) requested an assessment of all likely significant impacts on sensitive receptors, including shadow flicker, along with proposed mitigation.
- The EIAR's discussion focuses on whether shadow flicker can cause seizures (which is rare), but ignores chronic stress, fatigue, and loss of amenity due to regular flicker events within residential interiors.

The result is a narrow and outdated view of human health inconsistent with EPA (2022) guidance, which defines health as "a state of complete physical, mental and social well-being."

The shadow flicker assessment in the Cooloo Wind Farm EIAR is deficient, outdated, and incomplete. It underestimates the true scale of residential intrusion and fails to apply the precautionary principle required under both EU and Irish environmental law.

Given:

- 171 dwellings predicted to experience flicker
- Outdated 2006 guideline thresholds
- Absence of enforceable mitigation and cumulative analysis

this development cannot be deemed to have no likely significant effect on human health or amenity.

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. 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

I object to the proposed Cooloo Wind Farm because it would damage Ireland's ability to meet its climate targets under the Climate Action and Low Carbon Development Act 2021. By excavating peat and clearing mature forest, this project will release large amounts of stored carbon and increase emissions from the Land Use, Land Use Change and Forestry (LULUCF) sector, which is already a major source of greenhouse gases. Under the law, all public bodies must act consistently with national carbon budgets. Allowing a development that worsens LULUCF emissions contradicts that duty and the EU 'no debit' rule under Regulation (EU) 2018/841. Renewable energy projects are important, but they should not come at the cost of destroying carbon-rich habitats or undermining Ireland's long-term environmental obligations.

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

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

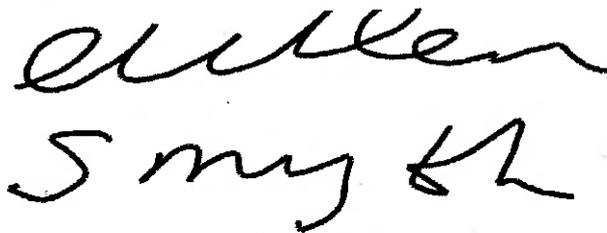
References:

- 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 urge An Coimisiún Pleanála to refuse permission for this 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. In addition it will no doubt result in further action to legally stop the windfarm from operating as a result of its impact on the community. An Coimisiún Pleanála must listen to the concerns of our community and act accordingly.

Yours Sincerely,



Name: Aideen and Christopher Smyth
Date: 07 November 2025