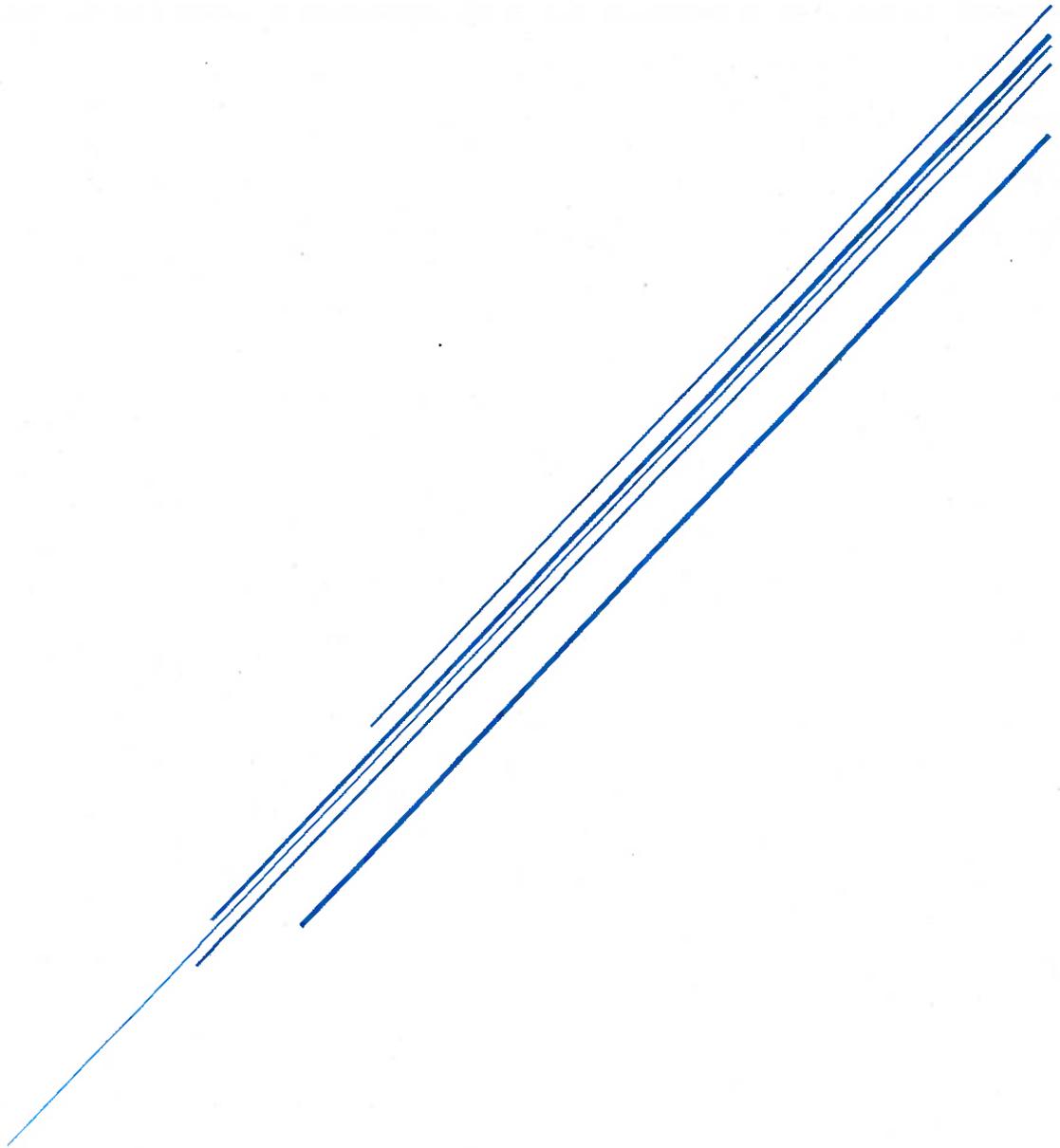


# **OBSERVATION/SUBMISSION TO PLANNING APPLICATION**

Case Reference: 323761



ANITA STONE  
16/11/2025

Case Reference: 323761

Anita Stone

Peak

Barnaderg

Tuam

Galway

15 November 2025

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

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## Background

I Anita Stone have lived all my life in the area, originally from Cloonboo, Lavally, Tuam. Where we grew up on the family farm which was the only form of income to my parents. I lived with a love of the nature, bog and the land around us the joy of seeing the swans coming on to the fields in wintertime, the beauty of the bog the joy of hearing the curlew in Cloonboo bog, the heather and the wildflowers and the bog covered in wild cotton.

The turbines will be in the flight path of the swans as they moved from Horseleap Lough, Briefield to our land and onto Lavally Lake. I worry for the mental health of the people in our parish and my own mental health as the landscape changes for the worst. If this gets the go ahead, to think every day of our remaining life we as a parish will have to look at 9 monsteras turbines which will have ruined the natural look of our and my little part of the world. When I will look out my window to see the moon rise in winter or the summer nights, I will see red lights we will have to travel to get a clear view of the moon. We don't need much in life and nature is the one gift we all get free, why Neoen Renewables Ireland Limited or any other large companies has the right to take away my peace of mind the beauty that surrounds me, Is my Question. I am not against renewable energy as we have solar panels installed and feel this is the way to go.

There are 3 National schools with in a 3km radius of this proposed wind farm as the crow flies. How are the children going to concentrate at school with noise pollution and flicker. Does the fact that there are 3 schools Barnaderg, Cooloo, and Briefield not suggest that the population is to high and not suitable for a wind farm.

Currently, I now live in Barnaderg where my husband Patrick and I ran the local Centra shop for 30 years. This proposal has put neighbour against neighbour and is dividing the community all ready.

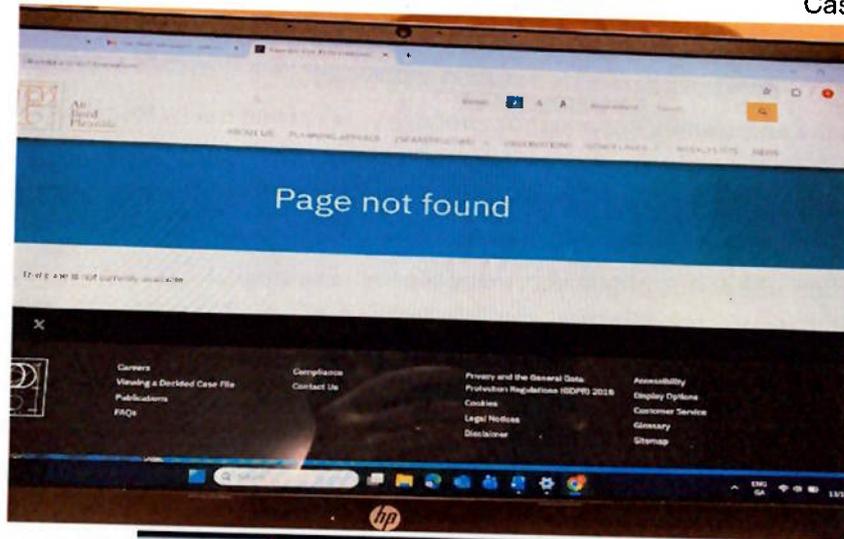
**I Strongly request that this planning application be refused and want to object to Cooloo Wind Farm on the following ground.**

## My Observations

- The applicant must provide a website where the application can be inspected. You can find the website address on the newspaper notice and on the site notice (if applicable). The notices will provide information on how the public can make an observation to An Coimisiún Pleanála about the application.

**<https://www.pleanala.ie/en-ie/observations>**

- The first is that the planning notice in the Irish Examiner they provided an incorrect website link for making objections. It says "[www.pleanala.ie/enie/observations](http://www.pleanala.ie/enie/observations)" instead of the real "/en-ie/observations". Since the info is wrong and an unfair disadvantage to the public. It should be re-advertised in the correct manner.



spect Hill, Galway (9:00am- 4:00pm Monday- Friday)  
 The application may also be viewed/downloaded on the following website: [www.coolowdplanning.com](http://www.coolowdplanning.com)  
 Submissions or Observations may be made only to An Coimisiún Pleanála ("the Commission") 64 Marlborough Street, Dublin 1 or via the Commission's website [www.pleanala.ie/enfo/observations](http://www.pleanala.ie/enfo/observations) during the above-mentioned period of seven weeks relating to:

- i. The implications of the proposed development for proper planning and sustainable development, and
- ii. The likely effects on the environment of the proposed development, and
- iii. The likely effects of the proposed development on a European site, if carried out.

Any submissions/observations must be accompanied by a fee of €50 (except for certain prescribed bodies) and must be received by the Commission not later than 5:30pm on 21st November 2025. Such submissions/observations must also include the following information:

- The name of the person making the submission or observation, the name of the person acting on his or her behalf, if any, and the address to which any correspondence relating to the application should be sent,
- The subject matter of the submission or observation, and
- The reasons, considerations and arguments on which the submission or observation is based in full (Article 217 of the Planning and Development Regulations 2001, as amended, refers)

Any submissions or observations which do not comply with the above requirements cannot be considered by the Commission. The Commission may at its absolute discretion hold an oral hearing on the application (refer to 'A Guide to Public Participation in Strategic Infrastructure Development' at [www.pleanala.ie](http://www.pleanala.ie))

The Commission may in respect of an application for permission decide to:

- a) (i) grant the permission, or
- (ii) make such modifications to the proposed development as it specifies in its decision and grant permission in respect of the proposed development as so modified, or
- (iii) grant permission in respect of part of the proposed development (with or without specified modifications of the foregoing kind),

and any of the above decisions may be subject to or without conditions, or

b) Refuse to grant the permission

Any enquiries relating to the application process should be directed to the Strategic Infrastructure Development Section of An Coimisiún Pleanála (Tel. 01-8588100)

A person may question the validity of any such decision of the Commission by way of an application for judicial review, under Order 84 of the Rules of the Superior Courts (S.I. No. 15 of 1986, as amended by S.I. No. 691 of 2011), in accordance with Section 50 of the Planning and Development Act, 2000 as amended. Practical information on the review mechanism can be accessed on the Commission's website ([www.pleanala.ie](http://www.pleanala.ie)) under the following heading: Legal Notices – Judicial Review Notice. This information is also available on the Citizens Information Service website [www.citizensinformation.ie](http://www.citizensinformation.ie)

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## 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.

### • Ref 3.2 Site Location and Context

The Proposed Wind Farm is located within a rural, agricultural setting in east Galway, approximately 12km southeast of Tuam. The village of Brierfield is located approximately 1.3km south of the nearest proposed turbine, and the village of Moylough is located approximately 5.3km east of the nearest proposed turbine.

The above application has failed to mention the village of Barnaderg and approximately distance from the wind farm. The fact we have a school, Church, 2 pubs one of which is widely known for its restaurant, Post Office, DayBreak shop, housing estate on the Hillsbrook Road and a playground. The Killarinerin GAA club and Community Centre.

## 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.

## 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

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 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.

## Shadow Flicker

Given this proximity and the extraordinary scale of the proposed turbines, I believe the shadow flicker standards outlined in the Wind Energy Development Guidelines (2006) issued by the Department of Housing, Local Government and Heritage are no longer adequate to protect residential amenity or public health.

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 m<sup>2</sup> 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 Environmental Impact Assessment recommended turbine-specific control measures.

The 2006 Wind Energy Development Guidelines offer minimal direction on how shadow flicker should be assessed, modelled, or mitigated. This omission is particularly problematic in the context of modern turbine arrays, where cumulative impacts and technological scale far exceed what the original standards contemplated.

The Guidelines do not specify:

- Which modelling tools should be used (e.g. WindPRO, WAsP, or bespoke GIS-based systems)
- What input parameters are required (e.g. rotor dimensions, sun path algorithms, terrain shading)
- Whether modelling should account for worst-case scenarios or realistic exposure windows

This opens the door to inconsistent and potentially misleading assessments. Developers may use optimistic assumptions (e.g. average sunshine hours, limited exposure angles) that understate the true impact on nearby dwellings.

There is no requirement to assess:

- Overlapping flicker events from multiple turbines
- Multi-directional exposure due to turbine layout
- Seasonal variation in sun angle and flicker duration

The Guidelines do not require developers to implement or even consider:

- Automated curtailment systems that shut down turbines during predicted flicker windows
- Physical shielding (e.g. planting, screens) to block flicker paths

- Real-time monitoring or complaint-based response protocols

This leaves residents like us with no enforceable protection. Even if flicker exceeds tolerable levels, there is no mechanism to compel mitigation unless it's voluntarily offered by the developer or imposed by planning conditions.

Other jurisdictions have moved beyond static thresholds:

- Germany requires modelling based on actual sunshine hours and mandates curtailment if flicker exceeds 30 minutes per day.
- Scotland recommends site-specific modelling and mitigation, especially near sensitive receptors.
- The Netherlands uses dynamic modelling and requires flicker-free zones around homes.

Ireland's 2006 Guidelines fail to reflect these advances, leaving communities exposed to outdated standards that do not match the realities of modern turbine design.

The shadow flicker provisions in the 2006 Wind Energy Development Guidelines are outdated and insufficient for assessing the impacts of modern wind farms, particularly in residential settings like mine. The scale and proximity of the turbines proposed near my home significantly increase the risk of adverse effects, yet the current standards offer no meaningful protection.

I respectfully urge the planning authority to:

- Apply a precautionary approach
- Require robust modelling and mitigation
- Consider the lived experience of residents
- Reject applications that fail to demonstrate compliance with updated standards

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)
- Clean Power – Wind Turbines and Public Health

## 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.

## Farming

I am deeply concerned about the impact this proposed windfarm will have on my family members farming in Cloonboo, Cloonascragh, and Hillsbrook areas and the surrounding areas. Many of these are full-time and part-time 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, source of pride and satisfaction a love of the land and the animals. 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.

### Biodiversity impact

I object to the proposed development on the grounds of its significant and permanent impact on biodiversity, including legally protected habitats and species.

The project's Environmental Impact Assessment Report (EIAR) acknowledges a residual adverse effect on Degraded Raised Bog (habitat 7120), a habitat of County Importance with capacity for natural regeneration (EIAR Ch. 6, p. 142). Construction of the proposed floating access road between turbines T7 and T9 will directly remove approximately 0.18 ha of this sensitive peatland and disrupt its hydrological balance (EIAR Ch. 6, Sec. 6.5.2.1.1). This is contrary to the conservation obligations set out under the EU Habitats Directive (92/43/EEC).

The site supports cutover bogs (PB4) and Marsh Fritillary (*Euphydryas aurinia*), an Annex II species protected under European law. Breeding webs were recorded near turbine T5 within metres of proposed construction works (EIAR Ch. 6, Sec. 6.4.3.3). The disturbance, dust, and drainage changes associated with turbine and road construction threaten the species' survival locally, directly conflicting with Ireland's duty to maintain favourable conservation status for Annex II species.

The EIAR highlights potential effects on hydrology and connected wetland systems that could degrade otter (*Lutra lutra*) habitat and aquatic fauna (EIAR Ch. 6, Sec. 6.5.2.1.1 and 6.2.2). Otters are also protected under Annex II of the Habitats Directive, and any degradation of their habitat represents a breach of Ireland's legal obligations.

These outcomes are inconsistent with the objectives of the National Biodiversity Action Plan 2023–2030, which seeks to prevent net biodiversity loss. Allowing this development to proceed would contradict national policy commitments and international conservation obligations.

Given the acknowledged residual adverse effects on protected habitats and species, I respectfully request that An Coimisiún Pleanála refuse permission for this development. The permanent loss and degradation of biodiversity cannot be justified, particularly where protected species and habitats are involved.

### References:

- EU Habitats Directive (92/43/EEC)
- National Biodiversity Action Plan 2023–2030
- EIAR Chapter 6 (Biodiversity)
- An Coimisiún Pleanála Case 323761

## 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,

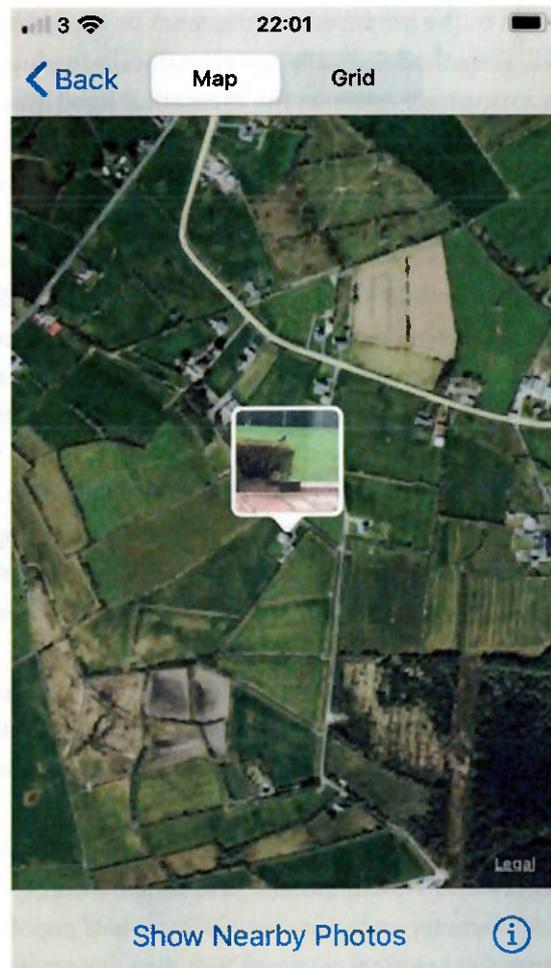
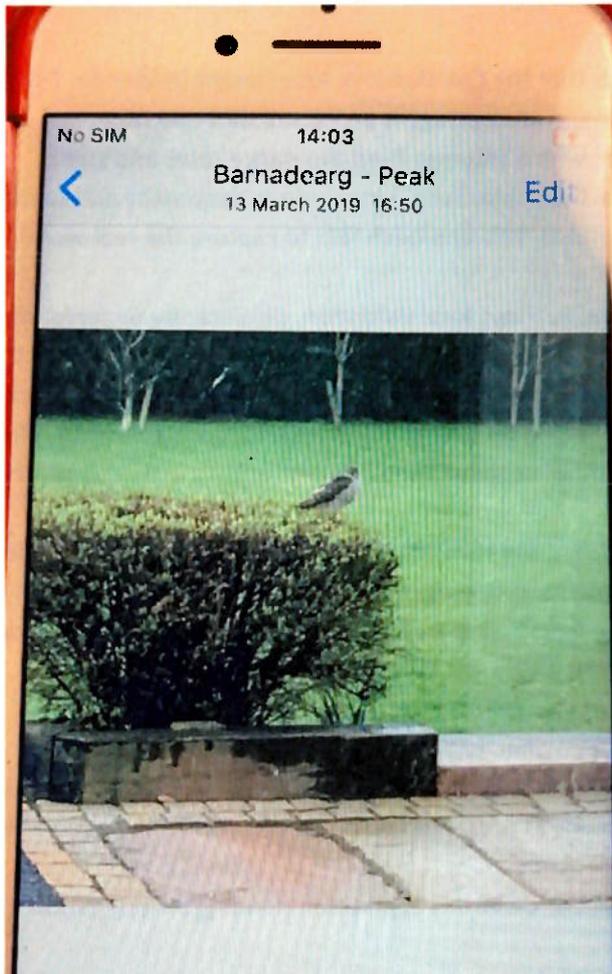
there is no guarantee that collision risks can be managed effectively.

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

- Birds: The site is only about 700 m from a Hen Harrier roost and 800 m from Horseleap Lough. Those are protected species and habitats. Please see photo below taken from my kitchen window. This bird is a regular visitor to our garden, but I have not been lucky enough to get a second photo.



- Conservation status: The curlew has a high conservation value because it is on the Birds of Conservation Concern in Ireland's red list, a status it shares with only a few other species, and is on the IUCN red list as a Near Threatened species, according to National Biodiversity Data Centre and National Parks & Wildlife Service.

Government action: The Irish government has established the Curlew Conservation Programme to protect the species, which involves local teams working with landowners to protect nests and improve habitats.

Habitat loss: The main threats to the curlew are habitat loss and fragmentation, which make breeding and nesting difficult and increase predation

<https://birdwatchireland.ie/>

## Biodiversity Impact - Earthworms

I object on the grounds that the Environmental Impact Assessment fails to address the impacts of wind turbine-induced vibrational noise on soil biodiversity and ecosystem function, particularly earthworm populations.

Recent peer-reviewed research by Velilla et al. (2021, *Oikos*, 130(7), 1033–1047) demonstrates that wind turbines generate continuous low-frequency vibrations (< 500 Hz) that travel considerable distances through soil. Key findings include:

- Vibrational noise decreased by only  $23 \pm 7$  dB over 200 metres, meaning measurable vibration extends well beyond turbine bases
  - Earthworm abundance declined by approximately 40% near turbines compared to sampling points further away
  - Soil compaction and crop type were ruled out, confirming vibrational noise was the primary cause
  - The impact is body-size-dependent, especially harmful to earthworms and other large soil invertebrates
- Earthworms are critical "ecosystem engineers" essential to soil health and agricultural productivity. A 40% decline in their populations can lead to:
- Reduced soil aeration and water infiltration, increasing flooding and erosion risks
  - Disruption of nutrient cycling and carbon sequestration, undermining soil fertility and climate regulation
  - Deterioration of soil structure and microbial balance, impacting crop performance and long-term land viability

These impacts are especially concerning in productive agricultural soils. The Cooloo site shares characteristics with the farmland studied by Velilla et al. (2021) — organically managed, rural, and composed of active agricultural soils.

The Environmental Impact Assessment submitted for Cooloo does not address subsurface vibrational noise

or its potential to degrade soil ecosystems. This represents a significant omission in the assessment of environmental and agricultural impacts.

I respectfully request that An Coimisiún Pleanála require:

- Comprehensive assessment of soil-borne vibrational noise impacts
- Evaluation of effects on soil macrofauna, especially earthworms
- Protective buffer zones of at least 200–250 metres from turbine bases to high-value agricultural soils
- Vibration-dampening measures in turbine design and foundations
- Soil biodiversity indicators in post-construction monitoring

Reference:

- Velilla, E., Collinson, E., Bellato, L., Berg, M.P., & Halfwerk, W. (2021). Vibrational noise from wind energy turbines negatively impacts earthworm abundance. *Oikos*, 130(7), 1033–1047.

<https://doi.org/10.1111/oik.08166>

## Biodiversity Impact - Bats

I object to the Cooloo Wind Farm because the proposal fails to adequately protect bats, which are strictly protected under EU law. The developer's surveys show that several bat species, including the Lesser Horseshoe Bat, use the area leaving a real risk of collision, disturbance, and loss of important foraging

habitat. As these impacts cannot be confidently ruled out, the project should be refused on the grounds of non-compliance with the EU Habitats Directive and insufficient protection of bats and their habitats.

## Climate impact

I support renewable energy but object to the Cooloo Wind Farm because it will worsen Ireland's land-use emissions. Clearing mature forest and disturbing peat for turbine bases and access roads will release long-stored carbon into the atmosphere. Ireland's Climate Action and Low Carbon Development Act 2021 and the European Climate Law both require that each sector reduce its emissions without offsetting increases elsewhere. This means energy targets cannot legally override land-use targets. If projects like this go ahead without full rewetting and carbon recovery, Ireland risks breaching its climate budgets and facing EU fines. We need clean energy that complements, not competes with, our land-based climate commitments.

## Battery storage and substation safety risks

The original proposed area for the battery storage was near Cooloo National School now it is moved to the Hillsbrook area where several families live, 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 (LiFePO<sub>4</sub>) 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 residents, farmers, and the wider community. I therefore, strongly object to this proposal and ask that it be refused in full.



Anita Stone  
16<sup>th</sup> November 2025