

An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Re: Observation / Objection to Cooloo Wind Farm – Strategic Infrastructure Development

Case Number PAX07.32376
Applicant: Neoen Renewables Ireland Ltd.
Location: Townlands of Cloondahamper (Blake), Cloonascragh, Elmhill, Cooloo,
 Lecarrow, Dangan Eighter, Lissavally & Slievegorm, Co. Galway

Dear Sir / Madam,

We, Anthony Scarry & Siobhan O’Connell, of Brierfield, Moylough, Co. Galway, hereby make this formal submission in respect of the proposed Cooloo Wind Farm Strategic Infrastructure Development (SID).

Our home is located 2.75km south of turbine T4 as shown on the planning site layout drawings and grid connection drawings.

For the reasons set out below we object to the proposed development and respectfully request that An Coimisiún Pleanála refuse permission.

1. Policy context local & national

We are concerned with respect to the absence of up-to-date statutory planning guidelines in relation to wind energy developments. The proposed development is of a very large scale with turbines with a tip height of up to 185m in close proximity to residential homes. The current guidelines are outdated and inappropriate for assessment of developments of this scale.

We are concerned with the concentration of such developments across north and east galway. We do not believe that this high concentration of privately owned wind energy developments represents a fair and balanced approach to sustainable planning & development.

The planning report and EIAR which accompany the application acknowledge that a substantial part of the application site lies within an area where wind energy is “Generally to be Discouraged” in the Galway Local Authority Renewable Energy Strategy (LARES), which is incorporated into the Galway County Development Plan 2022–2028.

We submit that the proposal materially contravenes the LARES wind energy zoning and related objectives of the Galway County Development Plan, and that climate and renewable policy does not remove the need to respect a plan-led, evidence-based spatial strategy. We would request that the Commission have due regard to the Development Plan policies in accordance with their obligations under the Planning Acts.

2. Population & human health

It is considered that the cumulative effect of turbines, BESS/substation and traffic noise on neighbouring residents health, the psychological and stress impact of living under constant visual and noise dominance from industrial structures of this nature and the potential impacts on the future of the rural community as a result of lack of future developments in the area have not been given due regard.

We submit that the assessment of impacts on population and human health is overly generic and unbalanced and fails to capture the lived reality of residents living in close proximity to large scale wind energy developments.

3. Hydrology, groundwater and Water Framework Directive risks

We are also concerned for water quality and flood risk affecting neighbouring lands and lands downstream. The proposed development site is identified as an area underlain by a karstic limestone regionally important aquifer with zones of high and extreme groundwater vulnerability.

The location of the development within the Mid-Galway Public Water Source Protection Area has potential for serious and long-term negative impacts on the surrounding communities reliant on the Mid-Galway Public Water Supply for a supply of potable drinking water.

The combination of peat excavation, forestry felling, wind farm drainage, new hardstanding and a 20 km grid trench significantly increases the risk of sediment and pollutant mobilisation and altered runoff.

The Flood Risk Assessment acknowledges floodplains and flood-prone lands in the catchment yet relies heavily on mitigation measures which are not yet fully complete and therefore cannot be assessed.

It is considered that the development would be prejudicial to public health, would pose an unacceptable risk to the Mid-Galway Public Water Source and therefore, would be contrary to the proper planning and sustainable development of the area.

4. Grid connection, project splitting and cumulative impacts

The proposed development, as stated in the EIAR, includes a grid connection and Battery Energy Storage System (BESS). The grid connection & BESS do not form part of the application. It is clear that the proposed development cannot function without the grid connection and BESS.

A number of similar large scale wind energy development are also planned and at various stages of planning consent in the northeast Galway region, including in Clonberne, Corofin, Belclare and Kilconly.

It is considered that the combined effects of the proposed development, when considered in conjunction with the associated grid connection, BESS and similar wind energy developments in close proximity have not been fully considered.

Treating the development of the wind farm, grid connection and BESS as separate applications amounts to artificially splitting the project contrary to the spirit of the EIA Directive. It is our contention that the effects of the proposed development cannot be considered on its own without being considered in conjunction with the other connected and related developments.

Roads & traffic

The proposed access is located on the R332 Tuam to Horseleap road which is identified as a Class II Control Road under the current Galway County Development Plan where access is restricted.

The Construction & Environmental Management Plan prepared as part of the application identifies that the development will involve significant construction traffic movements. This together with the works required to facilitate the grid connection will have a detrimental impact on the local road network and is considered contrary to the policies and development standards contained in the Galway County Development Plan in this regard.

Much of the detailed design and mitigation including condition surveys, strengthening works, traffic management plans have been left to post consent stage. This does not permit affected parties to fully assess the potential impacts of the development on the local community.

6. Conclusion

In summary we submit that:

- The proposed development is premature having regard to the lack of appropriate development management guidance in relation to large scale wind energy installations of this type.
- The proposal materially contravenes the Galway County Development plan with respect to the location of the development, partially with an area where wind energy development is generally to be discouraged.
- The potential impacts on the population and human health have not been given due consideration and the assessment of same are overly generic.
- There is potential for significant impacts on the hydrology of the region, and it will pose an unacceptable risk to the Mid-Galway Public Water Supply.
- The cumulative effects of the development taken together with the associated grid connection and BESS and other similar developments in close proximity to the proposed development have not been adequately considered.
- The impact on the local road network and users of the road networks has not been given due regard.

For the reasons set out above, we respectfully request that An Coimisiún Pleanála refuse permission for the proposed development.

Yours faithfully,

Anthony Scarry

Siobhan O'Connell

Brierfield, Moylough, Co. Galway