

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Catherine Donnellan

Hillsbrook

Barnaderg

Tuam

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 20 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 have lived in this area since I was four years old, and it has always been my home and community. I recently built my house here, which is approximately 1 km from three of the nine proposed turbines, and all turbines are located within 2.64 km of my home. I chose this location very carefully and designed my house specifically to limit environmental and sensory impacts because I am neurodivergent. Maintaining a stable, predictable, and low-noise environment is essential for my wellbeing.

I work from home, so I rely on a stable broadband connection and a quiet environment to carry out my job. Any disruption from construction activity, noise, or interference has the potential to affect my ability to work and earn a living.

Outside of work, I greatly value the peaceful rural surroundings where I spend time with my nieces and nephew. I also plan to have children in the near future, and given the higher likelihood of neurodivergence, environmental stability will be especially important for their wellbeing and development.

The scale and proximity of the proposed turbines raise serious concerns for me regarding noise, visual impact, construction disturbance, and long-term changes to the rural character of the area. These impacts

would directly affect my quality of life, my ability to work, and the sensory-appropriate environment I rely on.

For these reasons, I strongly object to the proposed development.

Community Consultation and Engagement

The basis that the consultation was undertaken by Neoen and MKO for the Cooloo Wind Farm has failed to meet the basic expectations of transparent and inclusive community engagement. It falls short of national guidelines and the intent of An Bord Pleanála's Strategic Infrastructure Development process.

Statutory notices were published in the *Irish Examiner* instead of the *Tuam Herald*, which most local households rely on for news.

Despite claims of consultation with local groups, key organisations such as Killarinerin Community Council and Killarinerin GAA, were not engaged in any meaningful way.

No public event was held in Moylough, even though seven of nine turbines are proposed there, excluding many directly affected residents.

The developer's report cites "door-to-door engagement" with only 55 homes and ten written responses is evidence of a process that reached few and failed to inform many.

The developer's continued reliance on online materials to provide information disadvantaged rural residents with poor internet access and a large number of older residents without a technical knowledge.

These shortcomings show that the consultation was administrative rather than genuine, and did not provide the community with a fair chance to participate. An Bord Pleanála should recognise these significant deficiencies when assessing the project's compliance with public engagement standards.

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.

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.

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.

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 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.

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 m² 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

Impact of Wind Turbines on the Neurodiverse within the Community

Numerous studies and planning inspectors with An Coimisiún Pleanála have acknowledged that wind turbines can have negative effects on neurodiverse individuals. Research by Howell (2015) found that people with autism are more sensitive to environmental noise, experiencing higher rates of sleep disturbance, cognitive difficulties, and stress due to low-frequency noise (LFN). The neurodiverse community often struggles to filter background sounds, and constant turbine noise and vibration could cause pain, anxiety, and loss of concentration, reducing quality of life.

These impacts extend to education. Local schools and preschools, including Brierfield National School which has a special class for children with autism, would be particularly affected. Senior planning inspectors have previously noted that facilities for children with additional educational needs may become unviable near large-scale wind farms due to such disturbances.

Shadow flicker poses further risks, as studies (Becchio et al., 2010) show that individuals on the autistic spectrum may fixate on spinning movements, heightening distress. Those with epilepsy or neurological conditions may also be affected.

Ireland's obligations under the UN Convention on the Rights of Persons with Disabilities require protection from harm and equal enjoyment of rights. Allowing this development would contradict those principles.

While more research is needed, there is no definitive evidence proving that wind farms are safe for, and do not significantly impact, the neurodiverse community—and the absence of evidence is not evidence of absence.

References:

- An Bord Pleanála. (2016). PA0041 – Assisting report to Senior Inspector [PDF].
<https://www.pleanala.ie/anbordpleanala/media/abp/cases/reports/pa0/rpa0041a.pdf>
- An Bord Pleanála. (2015). Inspector's report: ABP-PA0038 [PDF].
<https://www.pleanala.ie/anbordpleanala/media/abp/cases/reports/pa0/rpa0038.pdf>
- Howell, G. (2015). Autism and the effect of introducing a new noise source into quiet rural communities: risk factor from industrial wind power generation
- Becchio C, Mari M, Castiello U (2010) Perception of Shadows in Children with Autism Spectrum Disorders. PLoS ONE 5(5): e10582.
<https://doi.org/10.1371/journal.pone.0010582>

Barnaderg National School

Barnaderg National School is located approximately 3.49 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. 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 - 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>

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

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

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

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

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.

Broadband Impact

Given the number currently working from home now, strong broadband is a necessity. There are concerns that the signal, and therefore working from home capabilities will be negatively affected by this proposed windfarm. This is due to the fact that the windfarm is situated exactly within line of sight to the mast. It is

unacceptable that broadband signal and mobile phone services utilizing this mast will be degraded, and potentially to such a degree that it will be unusable. This may be worsened by the width of the wind turbine needed to support the weight, and the blades which can create periodic drops in signal level and variable amounts of reflection.

Project Splitting

The applicant proposes to seek planning consent for the nine turbines at this stage, while deferring a separate application for the substation, BESS, and grid connection. This approach amounts to project splitting, which is contrary to proper planning practice and should not be permitted.

These elements are integral and interdependent components of a single development. They cannot function in isolation, nor can the community have their say on the development unless it is seen as one complete project. The entire scheme must therefore be evaluated as one complete project under a single planning process.

Conclusion

For all of the reasons set out in this submission, it is clear that this windfarm would cause more harm than benefit to our area. This community values its peace, safety, and way of life. The proposed windfarm threatens all of these. I ask An Coimisiún Pleanála to listen to the genuine concerns of local people and to reject this development in the interest of protecting our environment, our homes, and our future.

If permission is not refused outright, I request that an oral hearing be held so that I as a local can have my concerns about this development heard.

Yours Sincerely,

Catherine
Donnellan

Name: Catherine Donnellan

Date: 20 November 2025