Colin Fahy,
Brackloon, Ballyglunin, Tuam, Co. Galway

Date: 20-Nov-2025

To: An Bord Pleanála
Case Reference: PAX07.323761 / ABP-323761

Introduction

I wish to formally object to the proposed Cooloo windfarm development located within Cloondahamper, Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally and Slievegorm, Co.Galway (An Bord Pleanála ref. PAX07.323761 / 323761).

I am a resident, landowner, and agricultural consultant in the area. My family own the quarry located in Ballyglunin which is referenced in *"Ch 15 Material Assets F - 2025.09.26 - 190723"* of the application. I also farm locally and consult farmers who reside in the area of the proposed windfarm whose livelihoods depend on the local natural resources.

I strongly oppose this development due to the significant risks it poses to water quality, landscape character, biodiversity, human amenity, and the overall wellbeing of the local community. This submission outlines my detailed objections and the grounds on which I request refusal of planning permission.

1 Policy Context & Planning Framework

The Wind Energy Development Guidelines (2006) require planning authorities and An Bord Pleanála to carefully assess the impacts of windfarm projects on ground conditions, hydrology, ecology, landscape, and the surrounding community, including cumulative effects and decommissioning considerations. National policy supports renewable energy development but stresses that local environmental, social, and community impacts must be appropriately managed. The draft Revised Wind Energy Development Guidelines (2019) further strengthen protections by proposing stricter noise limits, enhanced protection for communities, and more rigorous environmental assessment procedures. Strategic planning guidance emphasizes that national objectives cannot override local environmental integrity or the rights of residents and landowners. In my opinion, the proposed development does not sufficiently meet the requirements of either national or local planning guidance and therefore warrants detailed scrutiny and objection.

2 Water Quality & Hydrology

The proposed development presents a serious risk to the local Barnaderg-Gortbeg Group water scheme supply, which serves both domestic households and agricultural operations in the area. Construction activities, including excavation for turbine foundations, access tracks, and crane

pads, may disturb natural drainage patterns, increase sediment loads, and introduce potential contaminants into the water system. Groundwater interactions may also be affected, with possible changes to aquifer recharge zones and spring flows that could reduce water availability or quality. The application lacks a detailed long term water monitoring plan and does not provide a clear remediation strategy should water quality be compromised. Without rigorous safeguards, the project poses a tangible risk to the safety and reliability of local water resources.

3 Landscape, Visual & Heritage Impacts

The turbines and associated infrastructure would significantly alter the rural landscape, which is currently open and visually coherent. The scale of the turbines, combined with access roads and a substation, would dominate views and disrupt the aesthetic and cultural character of the area. The EIAR does not adequately consider cumulative visual impacts with other developments in the region. Furthermore, the local area contains heritage features, including old field boundaries, ringforths, quarries, etc which may have archaeological significance. Construction and operational impacts could damage or permanently alter these features, compromising both heritage and landscape integrity. A robust assessment and mitigation strategy is essential, but the current proposal does not provide sufficient detail or assurance.

4 Ecological / Biodiversity Impacts

The development could negatively affect local flora and fauna, including protected bird and bat species that may be vulnerable to turbine operation. Habitat fragmentation is a concern, as the construction of access roads and turbine bases could disrupt ecological networks and reduce local biodiversity. While some temporary construction phase measures are referenced in the EIAR, there is no credible long term ecological management or monitoring strategy provided. Independent surveys are needed to establish baseline ecological conditions, and enforceable mitigation measures must be implemented to protect sensitive species. Without these safeguards, the project could have irreversible ecological impacts on the local environment.

5 Agricultural and Rural Economy / Brand Impact

Ireland markets its beef, lamb, and other agricultural products internationally as coming from quality-assured, family run farms, a cornerstone of the Bord Bia Origin Green programme. These campaigns emphasize traditional, pastoral landscapes, open fields, and an image of natural, clean, and sustainable farming. The introduction of large scale industrial turbines into these areas risks undermining this carefully cultivated image, making the countryside appear more industrialized and less "green" to both domestic and international consumers. This could have negative implications for the marketing of Irish agricultural products, potentially affecting sales, brand reputation, and the premium status of local produce. As a local farmer and agricultural consultant, I see a tangible risk that such visual industrialisation would conflict with Ireland's strategic efforts to promote its food exports as natural, environmentally conscious, and scenic, directly threatening the rural image that underpins Ireland's premium food export branding.

6 Noise, Shadow Flicker & Community Amenity

Operational noise from the turbines, including low frequency sound and amplitude modulation, may significantly impact nearby residents, livestock, and the general amenity of the area. Shadow flicker from turbine blades could also create disturbances in homes, farmyards, and working areas, reducing quality of life. The application does not provide detailed or enforceable measures to manage these impacts. Comprehensive noise and shadow flicker assessments are required, along with legally binding operational controls to ensure that the impacts on residents are minimized. Monitoring and a mechanism for residents to raise complaints should be part of any mitigation strategy, which is currently absent.

7 Traffic, Construction & Community Disruption

The construction phase will require the transport of large turbine components, concrete, and other materials, generating significant heavy vehicle traffic along rural roads that are not designed for sustained heavy use. This raises safety concerns for residents, farmers, and other road users, and there is a high potential for road damage. The proposal also does not sufficiently address noise, dust, and vibration impacts from construction activities on nearby communities. A comprehensive Construction Traffic Management Plan and a Community Liaison Group are necessary to ensure that local concerns are addressed and that risks are minimized. Financial guarantees to cover potential road repairs should also be considered to protect the local infrastructure.

8 Socio-Economic Impacts

The presence of the wind farm is likely to negatively affect property values and the amenity of the surrounding area. Tourism and local businesses may also be impacted due to the visual intrusion and industrialisation of a previously rural landscape. While renewable energy projects may offer economic benefits, the application does not provide sufficient detail on local benefit sharing or community engagement. A thorough socio-economic impact assessment and transparent community benefit measures are required to mitigate potential adverse effects. Without such measures, the project may impose disproportionate social and economic costs on the local community.

9 Quarry Clarification

The application references local quarries as potential sources of "*concrete, crushed stone and internal road surfacing materials*". I wish to clarify that my family owned quarry has been inactive since approximately 2008, holds no active extraction licence, and will not supply any material for this windfarm and associated works. Under the EIA Directive (2014/52/EU) and established case law, cumulative assessment is required to be based on real, permitted or actively proposed developments. The inclusion of a quarry that is not active, does not have planning permission for extraction of materials, and does not have landowner consent represents a serious methodological flaw in the EIAR. This undermines the reliability of all conclusions drawn about cumulative effects and renders the EIAR non compliant and deficient. The Board cannot rely on

an assessment built on false assumptions, and this error alone necessitates further information, correction of the EIAR, or refusal of the application.

Conclusion

The proposed windfarm presents unacceptable risks to water quality, landscape character, biodiversity, human amenity, and socio-economic wellbeing. National renewable energy objectives do not justify these local harms, and the application does not meet the standards set out in national or draft wind energy guidelines. I strongly urge An Bord Pleanála to refuse permission or, at a minimum if permission is considered, it should be subject to strict and enforceable conditions, including robust water quality monitoring, comprehensive landscape and heritage mitigation, independent ecological management, noise and shadow flicker controls, a traffic management and community liaison framework, and legally binding socio-economic benefit measures.

Yours Sincerely,

Colin Fahy.