

## **Submission from Councillor Declan Geraghty (Member of Galway County Council)**

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- A chara,
- I would like to make a submission in respect of the proposed Cooloo Windfarm SID (Case number: 323761).
- I would firstly like to express concern with the absence of up-to-date statutory planning guidelines in relation to Wind Energy Developments. This development is of a very large scale with turbines of close to 200m high in close proximity to residential homes. The current guidelines are outdated and inappropriate for developments of this scale. I would ask that An Comisiún take this into consideration when making a determination on this application.
- I would also like to express concern with the concentration of such developments across North and East County Galway. I do not believe that this high concentration is fair on local communities or is a balanced approach to planning development.
- I would like to highlight concerns in relation to the public consultation carried out with the local community in relation to this development. It is imperative for developments of this nature that there is adequate consultation and engagement with community. It has been reported to me that some local residents were not informed and given an opportunity to take part in the consultation process and that concerns expressed as part of that process have not been taken into account as part of this planning application.
- I understand that a large number of submissions have been made by members of the local community highlighting issues in relation to the scale of this development, the appropriateness of the location, effects on homes and the local community, public health, biodiversity and environmental matters. These are all considerations that An Comisiún must take into account, and I urge you to consider the potential impact of this development when making your determination.

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<b>Important points to include in my submission against Cooloo Windfarm Development</b>	
<b>Potential effect on Local Water Sources</b>	<ul style="list-style-type: none"><li>• The proposed development puts at risk 3 different water schemes - i.e. Barnaderg/Gortbeg, Brierfield and Mid Galway Public Scheme (circa. 10,000 households).</li><li>• The spring at Pollifrin, Brierfield and District GWS source, is considered to be part of the same zone of contribution (ZOC) as the Mid Galway PWS and Barnaderg Gortbeg GWS as they all form part of the same groundwater flow system.</li><li>• Two turbines are located within the Source Protection Area (SPA) for the above. This area is a highly karstified and hydrologically sensitive area.</li><li>• Planning documents state that there is a risk during construction to the water, as the developers cannot guarantee that the water will not be affected or that levels will not drop, putting the sources and the service users at risk.</li></ul>
<b>Project Splitting</b>	<ul style="list-style-type: none"><li>• The proposed development aims to secure planning first for the 9 turbines and then at a later stage to submit a separate planning permission for a substation, BESS and grid connection. This constitutes "project splitting", which should not be allowed.</li><li>• The proposed development is all one project and therefore the planning should only be considered as one project.</li></ul>
<b>Lack of Community Engagement</b>	<ul style="list-style-type: none"><li>• Developers have stated in their planning documents that they have made contact with a number of local community groups; however, the Barnaderg Cooloo Windfarm Action Collective has confirmed that a number of these groups were never contacted by the developer.</li><li>• The reported "door-to-door engagement" reached only 55 homes within 1 km of the turbines, yielding only ten written responses. This is an unacceptably low level of participation for a project of this scale.</li></ul>

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	<ul style="list-style-type: none"><li>• The opportunity for community engagement 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.</li><li>• Only one in-person meeting was held in Killerin, and no public consultation meeting was held in Moylough, where seven of the nine turbines are proposed, further excluding the most affected residents.</li><li>• There was no update meeting offered when the location for substation was changed.</li></ul>
<b>Effect on Roads and Transport due to Additional Traffic</b>	<ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li><li>• No robust plan has been presented for road strengthening, maintenance or reinstatement.</li><li>• The absence of detailed community-specific measures leaves local access, amenity and safety inadequately protected.</li><li>• Until comprehensive information and binding commitments are provided, the proposal represents an unacceptable risk to road infrastructure and rural community wellbeing.</li><li>• Having roads closed for a combined 210 days (at a minimum) is unacceptable.</li><li>• It is also unacceptable for locals to have diversions of up to 13.7km per journey for the duration of this project.</li><li>• Traffic volume surveys were conducted in July when all schools were closed.</li></ul>

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<b>Impact on Local Schools and the Student body</b>	<ul style="list-style-type: none"><li>• The presence of wind turbines near schools can have a range of impacts on students, staff, and the overall learning environment.</li><li>• Wind turbines produce both audible noise and low-frequency infrasound and shadow flicker, which can be noticeable inside buildings, which can cause a distraction.</li><li>• This constant distraction will interfere with children's attention and overall cognitive performance, making it more difficult for students to focus on learning.<ul style="list-style-type: none"><li>◦ <b>Brierfield NS</b> is 1.35 km away from the nearest wind turbine.</li><li>◦ <b>Cooloo NS</b> is 1.59km away from the nearest wind turbine.</li><li>◦ <b>Barnaderg NS</b> is located approximately 3.49 km from the nearest wind turbine.</li></ul></li></ul>
<b>Effects from Noise and Shadow Flicker</b>	<ul style="list-style-type: none"><li>• People within 1.8km of the windfarm will be impacted by the noise, Low Frequency Noise and Shadow Flicker. These are known to have impacts on health and wellbeing of people and animals.</li><li>• Mitigation measures are not sufficient.</li><li>• People have a right to enjoy their own property and not be impacted daily by a development.</li></ul>

I Remain,

Yours Sincerely,

Councillor Declan Geraghty  
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