

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Darran Shaughnessy

Dangan

Tuam

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 15 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,

My home is in Dangan located 1.9 km from proposed turbine T1. I live with my wife and young son (8 yrs old). We depend on the Barnaderg/Gortbeg water scheme for the water supply to our home. I am very concerned that the water supply will become contaminated during this industrial scale construction project. I am also concerned about the noise impact these turbines will have on my family's health and wellbeing. Another great concern is the impact this development will have on my son's future in the area. I fear that planning regulations will prevent him from one day living on our family land. I also think the road closures for over 200 days will block us in to our family home and have a severe impact on our daily lives. I also work from home to make a living and any outages or interruptions to electricity supply or broadband during the construction or operation of this wind farm will greatly impair my ability to work. I strongly urge An Coimisiún Pleanála to refuse this planning application for these reasons and the reasons listed below.

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 Killenerin Community Council and Killenerin 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.

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

The 2023 CERIS (Centre for Economic Research on Inclusivity and Sustainability) paper – ‘Wind Turbines and House Prices Along the West of Ireland: A Hedonic Pricing Approach’ – surveyed the prices of houses located near windfarms in seven counties.

The paper states that: ‘The analysis finds a robust and significant reduction in property value of -14.7% within 1km of a turbine’ and that ‘Back-of-the-envelope calculations suggest that the total loss in value for houses within 1km of a turbine in the case counties is approximately €6.8 million.’

Galway County Council is an agent for the state of the Republic of Ireland and as such is responsible to uphold Article 40 of the Irish Constitution which states – ‘the state shall in particular by its laws protect as best it may from unjust attack and in the case of injustice done vindicate the life, person, good name, and property rights of every citizen.’

I am aware that the Barnaderg Cooloo Wind Farm Action Collective have spoken to a local auctioneer, who said that he had trouble selling a house in County Mayo because it was close to several wind turbines. The auctioneer was able to site a specific instance whereby a married couple looked at the house and decided not to buy it. The auctioneer said that the presence of the wind turbines was a crucial factor in the couple's decision not to buy the house. The owners of this house ended up selling for less money than the couple had been initially willing to pay for the house.

Noise

The proposed Cooloo Wind Farm should be refused planning permission, citing the Irish High Court case *Byrne & Moorhead v ABO Energy* [2025] IEHC 330, in which wind turbine noise was legally recognized as a private nuisance, leading to the permanent shutdown of turbines in County Wexford. The objection highlights that the Cooloo proposal fails to address proven low-frequency and amplitude-modulated noise impacts similar to those measured in the Wexford case, where sound levels far exceeded safe limits and caused serious disturbance to residents living over a kilometre away. The Cooloo project's reliance on outdated ETSU-style noise standards, which disregard low-frequency and tonal effects, is therefore deemed inadequate to protect public health and residential amenity.

The proposed turbines at Cooloo—significantly larger than those involved in the Wexford case—are likely to generate even stronger low-frequency noise that travels farther and fluctuates more intensely under local atmospheric conditions. This increases the risk of nuisance and potential legal liability for both developers and planning authorities. Ireland's 2006 wind energy guidelines are outdated and fail to reflect modern scientific understanding of turbine acoustics. Until revised national standards are adopted, approving

large-scale wind farms under obsolete criteria would be unsafe and contrary to the public interest. Planning permission should therefore be refused due to the clear and foreseeable risk of harm to residential amenities, the inadequacy of current noise controls, and the legal precedent confirming wind turbine noise as a substantial nuisance.

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 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.

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

Lack of detailed traffic management plan

This submission objects to the proposed development due to insufficient traffic management and risk assessment in Appendix 15-2 (Traffic Management Plan). The plan omits essential quantitative data—such as expected abnormal load numbers, peak-phase traffic volumes, and route-specific scheduling—required to evaluate construction impacts. Narrow rural roads near Barnaderg and Cooloo lack the capacity for large turbine transport without pre-works strengthening or verge reinforcement. No detailed programme for road condition monitoring or reinstatement is provided. The TMP also fails to model cumulative or worst-case haulage scenarios, nor does it include enforceable mitigation measures for school transport, farm access or local business continuity. In the absence of these specifics, the project's potential impacts on road safety, infrastructure integrity and rural amenity remain unacceptably high. The application states that locals will be kept informed about traffic construction. Judging by how poorly locals were informed about the windfarm initially, I would be very sceptical as to whether we would be kept informed once construction was to commence. The Board should refuse permission or impose strict, verifiable traffic and haulage conditions.

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 proposed development of Cooloo Wind Farm, which comprises up to 9 turbines also includes planned ancillary infrastructure such as a battery energy storage system (BESS), substation, and grid connection.

However, the developer has noted in planning documents that they are seeking planning permission first for the turbines alone, with a separate planning application to follow later for the substation, BESS, and grid connection. Such a strategy constitutes project splitting, which undermines a comprehensive assessment of the full environmental, social, and infrastructural impacts of the proposal.

These components are not separate or optional: they are functionally and operationally interdependent. The turbine generation, energy storage, and grid export cannot meaningfully exist in isolation. Therefore, the entire Cooloo project must—and legally should—be reviewed as one integrated development.

This approach is not merely procedural: failing to assess all elements together risks underestimating cumulative impacts (noise, ecological disturbance, landscape, grid infrastructure), and weakens public transparency and engagement on the full scope of the development. Accordingly, planning permission should be considered for Cooloo Wind Farm as a single, unified project, not disaggregated stages.

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 local residents, farmers, and the wider community. I therefore strongly object to this proposal and ask that it be refused in full.

If permission is not refused outright, I request that an oral hearing be held so that local residents, farmers, and the wider community can have our say on the impacts of this development.

Yours Sincerely,

Darren Shaughnessy

Name: Darran Shaughnessy

Date: 15 November 2025