

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Don Doyle

Cooloo

Brierfield

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 07 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 Don object to the Cooloo windfarm development based on the reasons below: My family home is 1.45km from Turbine 8 and I'm concerned about the impact of the proposed development on the value of my property. I purchased my family home over 20 years ago and I chose this area as it is quiet and wished to live in a rural area due to its serenity and ambience. I want to raise my family with a strong community spirit and wish for my children to be able to live in this area for generations to come and to continue to enjoy the same atmosphere. I am extremely worried about the proposal to cut and remove peat from the natural and untouched bogs in this area. At a time where people are discouraged to cut turf due to climate concerns, this development will cause far more damage to the sectoral emission targets for LULUCF, in my opinion. Also, we should consider the current court cases that have resulted in damages being awarded to those living with-in close proximity to these wind mills and should avoid the costs associated with these by not going ahead with the development. I also have serious concerns about the potential traffic disruption and potential danger to children who might walk or cycle to school ( a favourite rite of passage on our local roads). I sincerely hope that you consider my objection to this proposal and halt this imposed development to preserve the community and people of this area.

## **Planning Framework and Guidelines**

The continued reliance on the Wind Energy Development Guidelines 2006 is no longer appropriate or proportionate given the significant evolution of wind energy technology and the clear advancements in scientific understanding since their publication nearly two decades ago. The 2006 Guidelines were developed in an era when turbines were typically less than 100 metres in height and generated 1–2 MW of power. The turbines in this proposed development will be 180 metres and produce approximately 6 MW of power. This will result in greater visual, acoustic, and environmental impacts than those contemplated in 2006.

The fact that the Wind Energy Development Guidelines 2006 has been acknowledged in the Dáil many times by many different people. In 2013 Deputy Michéal Martin told, the then Taoiseach, Enda Kenny that the guidelines were outdated and were never framed in the context of the new technology. Yet in 2025 Tánaiste Simon Harris is still saying in the Dáil that he acknowledges that the guidelines are outdated and that there is a specific commitment from the Government to prioritise the publication of new guidelines.

It is therefore unreasonable and contrary to the principles of proper planning and sustainable development for An Coimisiún Pleanála to continue to rely solely on the 2006 Guidelines. An Coimisiún Pleanála must make sure that any decision made is not based on outdated standards.

## **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**

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.

### **Cooloo National School**

Cooloo National School is 1.59km away from Turbine No 8.

The turbines being this close to the school will no doubt have an impact on the education of the children in Cooloo NS. The school will suffer from noise pollution, infrasound and shadow flicker. 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 catchment area of Cooloo NS. This will lead to fewer children in the community and may lead to the school losing teachers, and ultimately the school closure.

### **Road disruption during construction**

I wish to object to the proposed development on the grounds of significant traffic and road safety impacts during construction, particularly in relation to abnormal load deliveries. 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. 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. No robust plan has been presented for road strengthening, maintenance or reinstatement. The absence of detailed community-specific measures leaves local access, amenity and safety inadequately protected. Until comprehensive information and binding commitments are provided, the proposal represents an unacceptable risk to road infrastructure and rural community wellbeing. Having roads closed for a combined 210 days (at a minimum) is unacceptable. It is also unacceptable for locals to have diversions of up to 13.7km per journey for the duration of this project.

### **Climate impact**

I object to the proposed Cooloo Wind Farm because it would damage Ireland's ability to meet its climate targets under the Climate Action and Low Carbon Development Act 2021. By excavating peat and clearing mature forest, this project will release large amounts of stored carbon and increase emissions from the Land Use, Land Use Change and Forestry (LULUCF) sector, which is already a major source of greenhouse gases. Under the law, all public bodies must act consistently with national carbon budgets. Allowing a development that worsens LULUCF emissions contradicts that duty and the EU 'no debit' rule under Regulation (EU) 2018/841. Renewable energy projects are important, but they should not come at the cost of

destroying carbon-rich habitats or undermining Ireland's long-term environmental obligations.

### **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

### **Conclusion**

In light of the serious concerns outlined above I urge An Coimisiún Pleanála to refuse permission for this development. This proposal has also divided our community and in time, if this development is allowed to go ahead, it will destroy relationships within the community and no doubt have an impact on the population of the

community. In addition it will no doubt result in further action to legally stop the windfarm from operating as a result of its impact on the community. An Coimisiún Pleanála must listen to the concerns of our community and act accordingly.

Yours Sincerely,

A handwritten signature in black ink, appearing to be 'D. Doyle', written in a cursive style.

Name: Don Doyle

Date: 07 November 2025