

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Donal Gilligan

Dangan

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 live with my wife in Dangan Tuam . I am 1.1km from the nearest proposed turbine which is turbine 1. I have lived there all my life and reared my three children . They have now moved away but visit regularly . When I started out my life there as a younger man I experienced a lot of disruption and constant noise during the time of the sugar beat factory in Tuam. The lorries would pass right by my house which is right out on the road and where the road climbs to a steep hill (known as Mullins Hill) . The lorries would vibrate while changing gear on the hill and my home would actually shake. There was approximately 20-25 lorries per day. This noise could start at 05.00 am and continue throughout the day. It was so intrusive that myself and my wife had to move our bedroom to the back of the house during the campaign. This happened every year from 1975 until 1985 when the factory closed.

My concern is that this project will result in even more impactful disruption to our everyday lives because that is the same road they will have lorries travelling on for this proposed project. The estimate by the developers own admission is that there will be 100 lorry loads per day travelling this road the R332 for 212 days during construction.

This for me and my wife is extremely concerning but there are many other reasons I am concerned. I feel there was a lack of communication with local people, there could be disruption to the Barnaderg Gortbeg water scheme, shadow flicker can travel more than 1km ,noise from the Turbines themselves,disruption to the bog and biodiversity of the area and I am concerned that the carbon footprint of the project will take up to

2 life cycles of turbine to be offset. For these reasons and for the reasons outlined below I urge An Coimisiún Pleanála to refuse planning for this proposed development.

### **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 karstified and hydrologically sensitive area.

### **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.

### **Shadow Flicker**

Chapter 5 of the EIAR ('Population and Human Health') states that the nearest residential property is 720 metres away from the closest wind turbine (T8). However there is no mention of a house (Eircode H53 FF64) that is 530 metres away from Turbines 4 and 5 and 600 metres away from Turbine 8. This property is not accounted for at all in the EIAR.

The Wind Energy Guidelines of 2006 advise a setback distance between a wind turbine and a house of 500 metres. These guidelines are almost 20 years old and outdated.

The 2019 Draft Wind Energy Development Guidelines suggest a mandatory minimum setback distance of 500 metres between a wind turbine and the nearest residential property, and 4 times the tip height, whichever is greater.

Shadow flicker, caused by the rotating blades of wind turbines casting intermittent shadows, can have a significant impact on nearby residents. Prolonged exposure to these flickering shadows can cause visual discomfort, headaches, and even trigger migraines in susceptible individuals. Adequate setback distances and screening measures should be implemented to minimize the potential health effects associated with shadow flicker.

## **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

## **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

## **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.

## **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**

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,

Donal Gilligan

Name: Donal Gilligan

Date: 20 November 2025