

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

James Henry
Cloondahamper
lavally
Tuam
Galway

To: An Coimisiún Pleanála
64 Marlborough Street
Dublin 1
D01 V902

Date: 09 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'm living within 1.13km from T7 of the proposed windfarm. I'm worried that this development will lead to eyesores in the area as these turbines are enormous in size and can even be seen from Roscommon. I'm afraid that during the construction phase the traffic delays will stop me from getting to work on time and lead to stress. I have extended family living in the area and it is very scenic and peaceful and I'm afraid of what the future holds for our community.

Community Consultation and Engagement

The consultation led by Neoen and MKO for the Cooloo Wind Farm was deeply flawed and misleading. It does not meet the standards of genuine public engagement expected by An Bord Pleanála.

Notices appeared in the Irish Examiner while the Tuam Herald, the community's main news source, was ignored.

There was only a single public consultation meeting which was held outside Moylough, even though seven of nine turbines are proposed there. The plans have also changed significantly since this original meeting.

Despite claims of outreach to community groups, neither Killarney Community Council nor Killarney GAA were consulted. Only 55 homes were visited during 'door-to-door' engagement and ten written responses were received which is evidence of a process that failed to inform or involve the community. With poor broadband limiting access to online materials, and many residents not having the skills or technical knowledge to access online content, many locals were effectively excluded.

This was not meaningful consultation but a box-ticking exercise which did not provide the community with a fair chance to participate. These failures must carry serious weight in An Bord Pleanála's consideration of the application.

Planning Framework and Guidelines

The ongoing reliance on the Wind Energy Development Guidelines 2006 is increasingly inappropriate given the advancements in wind energy technology almost twenty years ago. At the time, turbines rarely exceeded 100 metres in height and produced 1–2 MW of power. In contrast, the turbines proposed in this development will reach 180 metres and generate approximately 6 MW, resulting in significantly greater impacts than those envisaged by the 2006 Guidelines.

These guidelines have repeatedly been acknowledged in the Dáil as outdated. In 2013, Deputy Micheál Martin informed then-Taoiseach Enda Kenny that the guidelines did not account for contemporary technology. In 2025, Tánaiste Simon Harris reiterated in the Dáil that the guidelines remain outdated.

Accordingly, it is unreasonable and inconsistent with principles of proper planning and sustainable development for An Coimisiún Pleanála to rely solely on the 2006 Guidelines. Any decision must be informed by current standards and technological realities.

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

A study from the University of Galway and international research indicates that homes within 1 km of wind turbines experience adverse effects on property value, with reductions of up to 14.7%. My home falls within this range, and I am deeply concerned about the financial and emotional impact this will have on my family and our future prospects. The planning application does not appear to address or mitigate this issue.

<https://www.universityofgalway.ie/media/researchsites/ceris/files/WP-2023-01.pdf>

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

Similar to noise, shadow flicker caused by turbines would be similar to living with a faulty light bulb during the day, and at night, with flashing red lights. Residents have a right to live in their homes without unreasonable interference. The UN Convention on Human Rights guarantees that people will not be subjected to arbitrary interference to their homes or family.

National Schools

The presence of wind turbines near schools can have a range of impacts on students, staff, and the overall learning environment. Wind turbines produce both audible noise and low-frequency infrasound, which can be noticeable inside buildings, which can cause a distraction. This constant distraction will interfere with children's attention and overall cognitive performance, making it more difficult for students to focus on learning.

- Cooloo NS is 1.59km away from the nearest wind turbine.
- Brierfield NS is 1.35 km away from the nearest wind turbine.
- Barnaderg NS is located approximately 2.49 km from the nearest wind turbine.

Shadow flicker caused by rotating turbine blades can create intermittent light in classrooms, which can be distracting and, in some cases, uncomfortable or stressful for children. The noise and shadow flicker will also

greatly impact on the children in the school who have an additional need. There is a lack of research to state the impact on these children.

In addition to the above, during the construction phase and while laying the cabling, the roads will experience increased traffic and road closures. This will impact children travelling to and from school. While the severity of these impacts depends on distance from the turbines, it is clear that wind turbines in close proximity to schools have the potential to disrupt learning, reduce student wellbeing, and interfere with the overall educational experience.

Barnaderg National School

Barnaderg National School is located approximately 2.49 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.

Farming

There are dairy and dry-stock farmers in Barnaderg, Cooloo and the surrounding areas, both full-time and part-time. Holdings vary in size. Many of these farmers depend on their livestock performing well in order to pay their bills. Also, those who are farming in the area enjoy the work they do, in the absence of shadow flicker, noise or visual pollution. If this development is granted their livelihoods will be impacted.

The 'Importance of Noise Hygiene in Dairy Cattle Farming – A Review' (Published November 1st of 2023 by Dimo Dimov, Toncho Penev and Ivaylo Marinov) details how vibration and noise from a milking parlour can negatively impact the milk yield and milk quality of a dairy cow. The paper also discusses how exposing animals to noise from an unfamiliar source can cause them stress.

It is also important to note that the developer has not taken into account the ways in which farmers depend on the local roads for moving cattle and for access to their land when going about their daily tasks within their farms.

Reference:

Dimov, D., Penev, T., and Marinov, I. (2023) 'Importance of Noise Hygiene in Dairy Cattle Farming – A Review'. Featured Position and Review Papers in Acoustics Science.

Available at: <https://www.mdpi.com/2624-599X/5/4/59>.

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

Extra construction traffic

I strongly object to this proposal due to the major disruption and safety risks it poses to our local community during the construction phase. The Traffic Management Plan fails to provide clear information on delivery schedules, routes or mitigation for abnormal turbine loads. Our rural roads are narrow, shared by farm machinery, school buses and local traffic, and cannot safely accommodate such heavy haulage without damage or obstruction. The application states that there will be approximately 14 extra return trips made by trucks carrying materials. This is vastly underestimated for a project of this size. There are no binding guarantees on road repairs, traffic management or timing of deliveries to avoid peak community use. Residents, farms and schools in Barnaderg, Cooloo and surrounding areas will face delays, dust, noise and restricted access. This plan does not adequately safeguard community safety, local livelihoods or the integrity of rural infrastructure. Permission should not proceed without full, enforceable traffic controls and local protection measures.

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.

Major accidents and natural disasters

I object on the grounds that Chapter 16 of the Cooloo Wind Farm EIAR fails to provide a robust assessment

of major accident and natural disaster risks.

The report's references to peat instability and raised-bog cutover are inadequate given the known susceptibility of peat landscapes to movement and sediment release during heavy rainfall or storm surge events. The EIAR's reliance on generic statements about low geological risk neglects the amplified high-wind, flood and peat-fire hazards forecast for County Galway under the local authority climate plan.

The lack of detailed modelling of flood-pathways or worst-case scenario storm events undermines the precautionary principle embedded in Irish planning law. This is a serious deficiency given the scale of the proposed development and the sensitivity of the peat landscape.

No explicit contingency or evacuation measures are detailed for the community along the grid-route corridor — a serious omission when tall turbines and infrastructure could present hazard in extreme events.

The assessment is incomplete and fails to satisfy the legislative requirements of an EIAR insofar as it must identify, describe and assess direct and indirect effects of the development on the environment and human beings.

I call on An Coimisiún Pleanála to require an independent supplementary risk assessment, specific to peat-hazard, flood-modelling and major-accident scenarios, before any decision is made on this application.

References:

- Galway County Council (2024) Local Authority Climate Action Plan 2024-2029
- Environmental Protection Agency (EPA) (2022) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EIAR)
- European Commission (2024) Environmental Impact Assessment: Overview of EU Rules

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.

Conclusion

For all of the reasons set out in this submission, it is clear that this windfarm would cause more harm than benefit to our area. This community values its peace, safety, and way of life. The proposed windfarm threatens all of these. I ask An Coimisiún Pleanála to listen to the genuine concerns of local people and to reject this development in the interest of protecting our environment, our homes, and our future.

If permission is not refused outright, I request that an oral hearing be held so that I as a local can have my concerns about this development heard.

Yours Sincerely,

A handwritten signature in black ink, appearing to read "James Henry". The signature is written in a cursive style with a prominent horizontal line above the first letter 'J'.

Name: James Henry

Date: 09 November 2025