

**The Secretary**

**An Coimisiún Pleanála**

64 Marlborough Street

Dublin 1

D01 V902

**21 November 2025**

**RE: OBSERVATION (SID)**

<b>ACP Case Reference</b>	<b>323761</b>
<b>Proposed Development</b>	<b>Cooloo Wind Farm</b>
<b>Location</b>	Cloondahamper, Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally, and Slievegorm, Co Galway
<b>Applicant</b>	Neoen Renewables Ireland Limited

*A Chara,*

**I wish to make a submission regarding the proposed windfarm development on Cooloo, Co. Galway [REF: ACP Case 323761]**

I live in Cooloo with my wife and teenage daughter since September 2021. Having lived in East Galway for the last 25 years, we were all very excited to join this rural community due to the tranquil environment, the ability to walk unimpeded along country roads, enjoying the uninterrupted views, as well as the sights and sounds of nature situated all around our property.

We are very proud of our heritage and believe strongly in preserving the integrity and values of past generations. We are part of a community who shares the responsibility that comes

with this legacy, as we create a home and place that will pass to our only daughter and the family that may someday follow.

We are in favour of preserving the planet for future generations, however, this must not come at a cost to our communities. Simply put, a windfarm of the proposed size, scale and proximity to the local communities is too big, too loud and too close.

**Having completed my own research, engagement and outreach, I strongly object to the proposed windfarm development at Cooloo and Barnaderg, Co Galway on the following eleven (11) grounds:**

#### **1. COMMUNITY CONSULTATION AND ENGAGEMENT**

The developer's reports contain reference to consultation undertaken by Neoen and MKO for the proposed Cooloo Wind Farm, which in actuality fail to meet the basic expectations of transparent and inclusive community engagement. It also falls short of national guidelines and the intent of An Coimisiún Pleanála's Strategic Infrastructure Development process.

- Statutory notices were published in the Irish Examiner instead of the Tuam Herald, which most local households rely on for news.
- Despite claims of consultation with local groups, key organisations such as Killrerin Community Council and Killrerin GAA, have confirmed that they were not engaged in any meaningful way.
- No public event was held in Moylough, even though seven of nine turbines are proposed for this location, further excluding many directly affected residents.
- The developer's report cites "door-to-door engagement" with only 55 homes and ten written responses as evidence of a process that reached few and failed to inform many.

- The developer's relied on online materials to provide information disadvantaged rural residents with poor internet access and a large number of older residents without a technical knowledge.

These shortcomings show that the consultation was administrative rather than genuine, and did not provide the community with a fair chance to participate.

I strongly urge An Coimisiún Pleanála to recognise these significant deficiencies when assessing the project's compliance with public engagement standards.

## **2. 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 that 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.

I strongly urge An Coimisiún Pleanála to recognise that any decisions today must be informed by current standards and technological realities.

### 3. RIGHT TO OWN / TRANSFER PROPERTY

My wife and I spent a number of years in the US before returning home for family and health reasons. After renting for over 20 years, we finally purchased a property and settled into the community in Cooloo, Co Galway in 2021. We were looking forward to being able to bequeath this family land and home to our daughter.

**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.

I strongly urge An Coimisiún Pleanála to recognise that in these circumstances, permitting this development would be neither fair nor consistent with the principles of social justice recognised under Article 43.

#### 4. 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, my family will be deprived of the peaceful enjoyment of our 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 our 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 my family and other community residents of the quiet enjoyment of their homes and lands.

I strongly urge An Coimisiún Pleanála to recognise that 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.**

#### 5. BROADBAND

We are all now living in a post-Covid world, with a heavy reliance on internet and mobile connectivity to take part in regular homebased activities. My family are among an increasing number of neighbours currently working from home, attending college online and meeting household obligations and entertainment online.

Strong broadband is an absolute necessity.

We are therefore extremely concerned that the signal will be compromised, and so to our ability to continue to working from home where capabilities are 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 utilising 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.

## **6. VISUAL IMPACT**

In supporting renewable energy, developments must respect the local landscape. This project does not. The proposed size of the windfarm imposes an excessive visual impact which is inconsistent with the character of the area.

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 provided 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.

I strongly urge An Coimisiún Pleanála to recognise the visual and landscape impacts and unacceptable.

## 7. SCHOOLS

Having been part of school communities at pre-school, primary and secondary level, my wife and I are concerned that the presence of the wind turbines so close to the three of our local schools will have a negative, immediate and long-term impact on students, staff and the overall school community.

Turbines are known to create noise, low frequency infrasound and shadow flicker. These issues will no doubt impact on the students in the local schools.

There are three primary schools all less than 3.5 km away from a turbine.

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

I am also concerned that if planning permission is granted less people will be moving to or building in the Cooloo and Barnaderg areas. This will lead to fewer children in the community and may lead to the school losing teachers, and ultimately the school closure.

## 8. 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.'

As an agent for the state of the Republic of Ireland, Galway County Council 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 cite 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.

This is extremely troubling to me as we only just purchased this property in September 2021, and anticipated this to be an investment in our future and that of future generations.

## 9. NOISE

Planning permission for the proposed Cooloo Wind Farm should be refused on the basis that it poses a clear and foreseeable risk of substantial interference with the normal use and enjoyment of nearby homes.

In *Byrne & Moorhead v ABO Energy [2025] IEHC 330*, the Irish High Court found that wind turbine noise, and specifically low-frequency and amplitude-modulated sound, constituted a private nuisance under common law, as it significantly disrupted residents' ordinary domestic life.

The Court held that such noise amounted to an unreasonable and continuous intrusion, preventing the quiet occupation of the home and resulting in the permanent shutdown of three turbines in County Wexford.

The Cooloo proposal relies on outdated ETSU-based noise criteria that fail to account for the same low-frequency and modulated noise effects found to cause substantial nuisance in the Wexford case.

Given the proposed turbines' greater height and rotor size, the likelihood of these harmful acoustic effects occurring at Cooloo is even higher.

I strongly urge An Coimisiún Pleanála to consider that approving this development under obsolete standards would disregard the High Court's findings and expose local residents to predictable and legally recognized interference with their right to the peaceful enjoyment of their homes.

## 10. 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.

While 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.

In the meantime, the (Draft) 2019 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.

## 11. BIODIVERSITY IMPACT

As residents and now landowners in Cooloo, my wife and I are opposed to the proposed Cooloo Wind Farm because of its significant and permanent impact on biodiversity.

The developer'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. 6.5.2.1.2**), contrary to the conservation obligations set out under the EU Habitats Directive (92/43/EEC).

The site also supports cutover bogs (PB4) which impacts 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.

Further, 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).

I strongly urge An Coimisiún Pleanála to consider that these outcomes are inconsistent with the objectives of the National Biodiversity Action Plan 2023–2030, which seeks to prevent net biodiversity loss.

**IN CONCLUSION,**

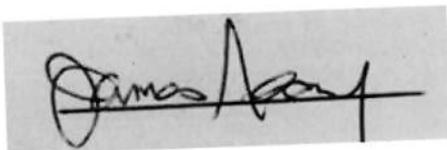
I implore An Coimisiún Pleanála to take please consider the genuine concerns raised by me and by hundreds of other locals and interested stakeholders and to reject this development in the interest of protecting our environment, our homes, and our future.

I respectfully urge An Coimisiún Pleanála to refuse permission for this development in light of the serious concerns outlined above.

The proposal is not compatible with the principles of proper planning or sustainable development. 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 the community can have our say on the impacts of this development.

***Mise le Meas,***



**James Neary**