

## **Objection to the Proposed Wind farm development at Cooloo**

Case Reference number: 323761

Dear Secretary,

We wish to formally lodge a submission objecting to the proposed Cooloo Wind Farm development by Neoen Renewables Ireland Limited.

My objections are based on significant material contraventions of planning policy and alleged flaws, omissions, and lack of clarity in the submitted Environmental Impact Assessment Report (EIAR) and supporting documentation, which renders the application defective and insufficient for the Board to make a robust determination.

### **1. Planning Policy Flaw: Material Contravention of Galway County Development Plan (CDP)**

The proposed development constitutes a Material Contravention of the Galway County Development Plan (CDP) 2022–2028.

- **Designated Area Conflict:** The developer's documentation acknowledges that portions of the proposed wind farm site, where up to 3 turbines are to be located, are designated as 'Generally to be Discouraged' for wind energy development under the Local Authority Renewable Energy Strategy (LARES), Appendix 1 of the CDP.
- **The Flaw:** The EIAR fails to provide sufficient overriding evidence that the national need for wind energy specifically justifies the irreversible negative impacts associated with developing a designated 'Generally to be Discouraged' area, particularly when alternative, less-constrained sites exist in the county. The precautionary principle should be applied, and permission should be refused due to the conflict with the site-specific planning policy.

## 2. Flaw in Use of Design Flexibility Parameters

The use of a range of parameters for the turbines (e.g., rotor diameter up to 162m, tip height up to 180m) introduces unacceptable uncertainty into the impact assessment.

- The Flaw: Noise and Shadow Flicker Assessments Unverifiable: An application for a Strategic Infrastructure Development (SID) must clearly assess the worst-case scenario for all impacts. The EIAR fails to confirm that the maximum noise limits and the zero Shadow Flicker criterion will be met across the entire permissible range of turbine sizes and hub heights as far as I can ascertain.
- Without a fixed turbine model, the noise contours and shadow flicker modelling are not definitive, introducing an unacceptable level of post-consent risk for local residents including ourselves. Additionally, the cumulative effect of the turbines and the BESS combined at the location of my dwelling under construction have not been assessed.
- Additionally, the cumulative effect of noise from Turbines T1-T5 as well as the BESS have not been carried out at our home under construction Galway county planning reference 2560413 which was granted permission on 5/6/2025. **I request noise sensitivity analysis at this location given the large number of turbines and the future proposed Substation and BESS only 165m from our home.** I also request an independent expert review on the model used to determine noise and shadow flicker at my property. If the model used is not utilising the latest scientific analysis compared to the real world outcome at previous sites in Ireland which are operational, then this proposal needs to be rejected until a peer reviewed model is validated with similar inter-turbine distances, specifications and spatial proximity including the proposed BESS and substation in one holistic analysis at the location of our home under construction. The approximate distances from each turbine to our home are detailed below:
  - i) T1-877m
  - ii) T2-872m
  - iii) T3-803m
  - iv) T4-1.358km
  - v) T5-1.628km
  - vi) T6-1.613km

- vii) T7-2.534km
- viii) T8-2.437km
- ix) T9-2.533km
- x) Proposed BESS and substation-approximately 165m

### **3. Inadequate Assessment of Hydrology and Water Quality**

The site's location near protected water bodies is highly sensitive and the documentation fails to provide sufficient guarantees.

- The Flaw: Water Quality/Lough Corrib SAC: The site is situated within the catchment of, or drains towards, the Lough Corrib Special Area of Conservation (SAC). The EIAR does not provide conclusive, site-specific hydrogeological mapping and analysis to demonstrate that the excavation of turbine bases, borrow pits, and access tracks in peatland will not lead to:
  - Destabilisation of Peat: Risk of peat slides or bog bursts due to ground works.
  - Pollutant Discharge: Siltation, sedimentation, and release of suspended solids into tributaries feeding the SAC, potentially impacting the protected habitat and species such as the Freshwater Pearl Mussel.
- The documentation relies too heavily on mitigation measures rather than proving the absence of significant risk from the outset.

### **4. Flaws in Landscape and Visual Impact Assessment (LVIA)**

The LVIA is insufficient for a development of this scale (turbines up to 180m tip height).

- The Flaw: Misleading Visualisations: I believe the submitted Photomontages and Wirelines (Visualisations) may not accurately represent the scale and visual dominance of the turbines, especially from key sensitive receptors and public viewpoints, including my own property. The use of a turbine range, rather than a definitive maximum, can lead to the visual impact being underestimated if the largest turbine is ultimately installed. The photomontages have not been based on the highest possibility in terms of the range of heights of the turbines. No photomontage has been

created at Dangan Eighter adjacent to my family home, farm, land and house under construction which is approximately 1km from a number of turbines and only 150-300m from the proposed BESS.

- Insufficient Cumulative Impact Analysis: The LVIA does not fully capture the cumulative impact of this proposal when considered alongside existing or permitted wind farms in the wider region, which will result in landscape saturation and a loss of the area's distinct character.
- The photos below encompass an approximate 180 degree view at the back of our home under construction as referenced in this document. No photomontage was carried out in Hillsbrook Demesne or Dangan Eighter where our home, farm and property are located. This area is one of the few pockets of biodiversity remaining where distance from humans allows a myriad of animals and flora to survive. The mitigation measures are not sufficient to meet the recommendations of the report from Citizens assembly on Biodiversity and the need for Energy cannot be to the detriment of Nature <https://citizensassembly.ie/report-of-the-citizens-assembly-on-biodiversity-loss-report-launches/> The issue with Wind energy is that by its restrictions in terms of setback distance, all of the nature pockets in Ireland are targeted, and a whole country review on wind energy was carried out in China which shows a detrimental impact on Birds (Dang et al., 2026) many of which are endangered and residing in this area.









Proposes BESS and substation in the field in the foreground





Above: Proposed BESS and substation in the upper left Quadrant.

Below: The proposed location for the BESS is unsuitable as the risk of pollution to the surrounding waterways is too high and impossible to mitigate. The site is elevated and flows into a number of streams which lead in three different directions according to the OSI maps as well as my visual verification on my own adjoining property. The fact that this substation and BESS are not included in the current application in my opinion is due to the large number of issues it presents. As a trained Chemist/Scientist and a farmer I adhere to strict rules on chemical storage and the bunding requirements must meet 110% of any chemical in my workplace and farm business. The scale of the battery system and the possibility for fire or leakage of volatile organic chemicals or release of toxic Hydrofluoric acid fumes means this area is unsuitable due to the unacceptable risk to the waterways down slope from the proposed site and the high cost to ensure bunding is adequate. Bunding would also be an issue in the case of a fire as the large volumes of water used to quench it would pose severe containment of contaminated water as well as the treatment of such waste. **Is there a facility in Ireland capable of treating mixed waste containing metals and organic volatiles at this scale?**



- **Given the number of proposed developments submitted for planning I request that this proposal be refused until a whole county environmental impact assessment be carried out as the local nature of the studies conducted in this application will be compounded by the construction of windfarms in concurrent locations and thus don't scientifically account for the future reduction in Biodiversity which will actually occur. Furthermore, I request that this application be rejected as it doesn't encompass the entire project and doesn't allow the community to assess a major component of a windfarm development which is a necessity ie the substation and BESS. A piecemeal approach to development should not be allowed, as an individual I wouldn't be allowed to propose a house in one application and a treatment system in the future.**

## **5. Potential Health Impacts on locals.**

I, Dr. Rola Donnellan am submitting this letter to formally object to the proposed wind turbine development in Cooloo. I do so both as a local resident and as a medical doctor with expertise in evidence-based health assessment. My objection is grounded in well-established scientific research and concerns regarding the psychological and psychophysiological impacts of wind turbines on nearby populations.

A comprehensive peer-reviewed review by Knopper et al. (2014) examined approximately 60 studies on wind turbines and human health. While major physiological harm is unlikely when turbines are appropriately sited, the authors clearly identify the psychological mechanisms that affect human well-being—particularly annoyance, sleep disturbance, and stress responses. These impacts are of genuine public-health concern and are especially relevant in a quiet rural community such as Barnaderg.

- **Noise-Related Annoyance and Stress**

The literature consistently identifies annoyance from turbine noise as a clinically meaningful stressor. This is recognised by the World Health Organization as a legitimate environmental health impact. Annoyance is strongly associated with reduced quality of life, heightened stress, and impaired concentration. This is most prevalent when turbine sound exceeds ~40 dB(A)—levels that may be particularly intrusive in the low-ambient-noise environment of Barnaderg. Chronic annoyance activates physiological stress pathways and can lead to significant long-term psychological strain. The proposal states these sound limits will not be exceeded but there may be issues with the model used to account for the cumulative impact of turbines given their close proximity to one another and worryingly the associated BESS and Substation not included in this application.

- **Sleep Disturbance**

Sleep disruption is one of the most robust and well-documented health effects linked with wind turbine exposure. The irregular amplitude-modulated nature of turbine noise can fragment sleep even at relatively low levels. Chronic sleep disturbance is medically recognised as contributing to cognitive impairment, mood changes, cardiovascular stress, and overall reductions in well-being.

- **Psychological impact of change in landscape**

Introduction of large industrial structures would notably disrupt the landscape's character and longstanding sense of tranquillity.

*Perceived loss of control* is a well-recognised concept in psychology and environmental health. It refers to the stress and distress people experience when a major change is imposed on their living environment without their input or ability to influence the outcome.

In small rural communities, people typically have a strong sense of connection to their environment and a high expectation of environmental stability. A perceived loss of control over a major development—especially one that changes the visual landscape and introduces intermittent noise—can therefore:

- heighten stress and anxiety,
- increase annoyance levels,
- amplify sleep disturbance,
- and intensify concern about potential health impacts.

Wind turbine proposals frequently lead to community division, anxiety, and feelings of inequity, all of which contribute to psychological burden. This is particularly impactful in smaller rural communities such as Barnaderg and the surrounding townlands.

### **Conclusion**

Taken together, the evidence demonstrates that psychological and psychophysiological impacts—particularly annoyance, sleep disturbance, and stress—constitute genuine, medically recognised health risks associated with wind turbine developments. These effects are secondary as in they are not directly linked to noise for instance but they will impact the health and well-being of residents nonetheless. Given the proximity of the proposed turbines to homes in Barnaderg and the townlands mentioned in the application, the quiet rural nature of the area, these risks are substantial and unacceptable.

For these reasons, I strongly object to the proposed development and respectfully request that an Coimisiun Pleanala refuse planning permission.

## 6. Conclusion and Request for Refusal

In conclusion, the documentation for the Cooloo Wind Farm is materially defective because:

1. It fails to provide compelling justification for the material contravention of the Galway County Development Plan.
2. It contains unacceptable uncertainty in critical technical assessments (Noise, Shadow Flicker) due to the flexible turbine parameters.
3. The Visual and Environmental Assessments do not comprehensively or convincingly rule out significant adverse impacts on the local landscape, protected habitats, and residential amenity.

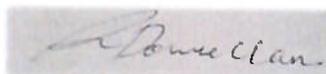
We respectfully request that An Coimisiún Pleanála refuse planning permission for the proposed Cooloo Wind Farm development. If planning is not refused we request an oral hearing in the community on how the large number of issues will be addressed, monitored, be made publicly available in real time and the Government bodies named which will enforce the conditions of planning, as well as evidence backing up enforcement in other areas in Ireland so the community does not suffer like other communities currently are which require escalation to a Judicial Review and no true resolution in a number of cases.

Yours sincerely,

James Donnellan  
Hillsbrook,  
Barnaderg,  
Tuam,  
Co.Galway

Dr. Rola Donnellan  
Hillsbrook,  
Barnaderg,  
Tuam,  
Co.Galway

[jbp.donnellan@gmail.com](mailto:jbp.donnellan@gmail.com)  
0871263285



## **Bibliography**

DANG, D., LI, X., LYU, X., LIU, S., LI, M., LIU, S., SU, N. & ZHANG, C. 2026. The development of wind power leads to a decline in bird species richness. *Environmental Impact Assessment Review*, 117.