

To: An Coimisiún Pleanála (ACP)

Re: Observation/Submission – Proposed Cooloo Wind Farm (SID) and all associated works

Case Ref: PAX07.323761 (also referenced as 323761)

Applicant's Agent: MKO on behalf of Neoen Renewables Ireland Ltd.

Location: Townlands of Cloondahamper (Blake), Cloonascragh, Elmhill, Cooloo,

Lecarrow, Dangan Eighter, Lissavally and Slievegorm, Co. Galway

EIAR: Yes

From: Killererin Community Council CLG

Barnaderg, Tuam, Co. Galway

(Registered community voluntary body serving the Barnaderg/Killererin area)

Date: 11/11/2025

Standing and summary position

Killererin Community Council (KCC) is the core, representative community body for Barnaderg/Killererin, coordinating local development, amenities, heritage and wellbeing initiatives for all ages and abilities. On behalf of residents, farm families, community groups and road users who rely on the affected local network, we object to the proposed Cooloo Wind Farm.

Bottom line: the proposal—nine (9) industrial wind turbines with tip heights up to c.180 m, rotor diameters c.150–162 m and hub heights c.99–105 m, plus a 100 m met mast, permanent foundations, hardstandings, underground cabling (33 kV), a temporary compound, and multiple new access points off the R332 and local roads L6056 (Dangan Eighter), L6312 (Dangan Eighter) and L6301 (Cooloo/Lecarrow)—would, as presented, result in significant adverse effects on residential amenity, public safety, local roads, landscape character, peatland/wetland hydrology, biodiversity and community wellbeing. It has not been developed with meaningful engagement with KCC as a primary stakeholder.

We therefore request that ACP refuse permission. If ACP is not minded to refuse, we request an Oral Hearing and, at minimum, a Substantial Further Information (SFI) request addressing the deficits listed below.

Failure of meaningful public engagement

Despite KCC's statutory role in local community development and our proximity to the site and haul routes, no meaningful, structured engagement has taken place with us.

Information that should be central to community understanding—verified turbine locations, precise setbacks to the nearest occupied dwellings, construction traffic volumes and timings, abnormal load routing, peat management, drainage and noise/ shadow-flicker controls—has not been presented to, tested with, or agreed by our Council.

Consultation limited to statutory letters does not constitute the early, iterative engagement expected for Strategic Infrastructure of this scale. This undermines public participation and raises a procedural fairness concern under the EIA process.

Residential amenity: noise, low-frequency noise & shadow flicker

The scale (up to 180 m tip) and proximity to established homes risks exceedances of day/night noise limits, amplitude modulation impacts, and low-frequency/tonal components that are insufficiently assessed in 'average' modelling.

Shadow flicker envelopes must be mapped for worst-case meteorology and orientation, cumulative with any existing/permitted turbines in North/East Galway. Legally enforceable curtailment with continuous monitoring (remote-access SCADA plus resident-triggered logging) is required where any property is at risk.

No binding post-commissioning verification and independent complaint protocol (with rapid curtailment obligations) has been offered.

Landscape & visual impact (LVIA) and cumulative effects

Turbines of ~180 m would dominate the skyline across Barnaderg/Cooloo and transform the character of a rural, low-rise landscape.

The scheme exacerbates the cumulative concentration of large-scale wind energy across North and East Galway. The LVIA must transparently present cumulative ZTVs, photomontages and wirelines from sensitive receptors (villages, schools, churches, community facilities, designated scenic routes and elevated viewpoints).

Aviation lighting for 180 m structures would introduce night-time visual intrusion and skyglow, further extending effects beyond daylight hours.

Traffic, transport & public safety (construction & operation)

The proposal introduces heavy construction traffic, abnormal loads and peak concrete pours onto the R332 and narrow L-class roads (L6056, L6312, L6301) that already carry agricultural machinery, school and commuter traffic.

There is no community-tested Construction Traffic Management Plan (CTMP) demonstrating:

swept-path analyses at all pinch points and junctions;

timing restrictions to avoid school and farm peaks;

structural road capacity and bridge/culvert assessments;

temporary lay-bys and traffic controls;

road condition surveys with a bond for full reinstatement.

Without this, there is an unacceptable road safety and disruption risk to Barnaderg NS & Brierfield NS families, vulnerable road users and farm operations.

Peat, hydrology & water environment

The townlands listed include bogland/peaty and wetland areas. Turbine platforms, tracks and drainage can trigger peat instability, turbidity plumes, and altered groundwater/turlough hydrology with downstream flood risk.

A robust Peat & Spoil Management Plan, Hydrogeological Risk Assessment, Silt/Runoff Control Plan, and Private Well Protection Plan (pre- and post-construction water quality monitoring with trigger-led mitigation) are not evidenced to the standard required for a SID EIAR.

Cumulative hydrological effects with other drainage or forestry operations are not transparently addressed.

Barnaderg–Gortbeg Group Water Scheme source protection area

The proposed Cooloo Wind Farm lies within the source protection area of the Barnaderg–Gortbeg Group Water Scheme, a community-owned scheme that has delivered top-quality, safe drinking water to local homes and farms for over fifty years. Any disturbance to hydrology, drainage or ground stability within this catchment risks contamination or disruption of this vital supply. Damage to the scheme would have a detrimental and far-reaching impact on the health, wellbeing, and sustainability of the entire community who depend on it daily.

Biodiversity (habitats, birds, bats)

The area supports hedgerow networks, wetlands and foraging corridors. Large turbines and met masts pose collision and displacement risks to bats and birds and cause habitat fragmentation.

Surveys must be multi-season, multi-year and include bat activity at blade height, breeding/wintering birds, and post-construction carcass searches with searcher efficiency bias correction—all tied to adaptive curtailment.

There is no clear biodiversity net gain pathway (hedgerow restoration, wetland protection, species-specific mitigation) commensurate with the scale of impact.

Human health & wellbeing

Prolonged exposure to turbine noise characteristics, shadow flicker, and continuous construction disturbance threatens sleep, stress and quality of life, particularly for children, older people and shift-workers.

The EIAR must demonstrate compliance with conservative night-time limits, present health-focused alternatives assessment (including reduced turbine numbers/heights) and commit to independent health-impact monitoring with enforceable curtailment.

Glint & glare, telecommunications and aviation safety

Blade glint/glare and potential telecoms interference (broadband, farm telemetry, emergency services) require independent baseline testing and binding remediation.

Turbine lighting and structure heights necessitate aviation safeguarding; detailed consultation outcomes and mitigation are not evidenced to the community.

Planning policy & proper planning/sustainable development

On the information available, the scheme fails to demonstrate compliance with the Galway County Development Plan objectives on:

protection of residential amenity;

landscape sensitivity/character and scenic views;

traffic safety on regional and local roads;

biodiversity and water protection; and

appropriate site selection and cumulative assessment for wind energy.

The applicant also relies on outdated national wind energy guidance without a precautionary, community-protective approach commensurate with 180 m machines.

Community benefit ≠ planning mitigation

While “community benefit” funds are sometimes referenced, no binding, transparent agreement has been offered to KCC or local groups. In any case, monetary benefit cannot compensate for fundamental amenity, safety, hydrology and biodiversity impacts or for procedural consultation failures.

Relief sought

Primary: Refuse permission on the grounds above; the proposal would be contrary to the proper planning and sustainable development of the area and would seriously injure residential amenity, public safety, the rural landscape and the environment.

In the alternative (without prejudice): If ACP is not minded to refuse outright, we request:

1. Oral Hearing given the scale, complexity and level of public concern;
2. Substantial Further Information requiring, inter alia:

A full Consultation Report evidencing meaningful engagement with Killarney Community Council and affected residents, with an issue-tracker and design changes;

Re-designed layout (including reduced turbine numbers/heights and increased setbacks) based on amenity and biodiversity constraints;

A detailed CTMP with haul-route approvals, time-of-day restrictions, condition surveys and a reinstatement bond;

Comprehensive peat/hydrology and private wells protection plans;

Independent noise (including amplitude modulation/low-frequency) and shadowflicker assessments with hard curtailment commitments and real-time monitoring accessible to residents and the Planning Authority;

A measurable Biodiversity Mitigation & Monitoring Plan with adaptive curtailment and net-gain targets;

Aviation/telecoms safeguarding with binding remedies;

A Compliance & Community Liaison Plan (named contact, complaints protocol, response timelines, enforcement triggers).

Please acknowledge receipt of this submission and notify Killarney Community Council of any further information submissions and/or any Oral Hearing.

Yours faithfully,
Killarney Community Council CLG
Barnaderg, Co. Galway

Olivia Rooney
Chairperson
Imanemore,
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