

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Lisa McMullin

Attymon

Athenry

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 08 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 in Attymon in East Galway and I am very concerned about the cumulative effects of these Industrial Wind Farms will have on the East Galway landscape. I live with my partner Shaun and our 2 neurodiverse children who are very sensitive to environmental changes.

Even though I live a good distance from the proposed Cooloo Wind Farm site the Mid Galway Public Water scheme supplies our house and community and I am worried about the implications if this supply is damaged.

I urge An Coimisiún Pleanála to reject the planning application for Cooloo Wind Farm and object on the following grounds

## **Planning Framework and Guidelines**

Relying on the Wind Energy Development Guidelines 2006 is no longer appropriate. Since their publication, wind energy technology has advanced significantly, and scientific understanding has deepened. The 2006 Guidelines were based on turbines under 100 metres and 1–2MW in capacity, whereas the proposed turbines will be 180 metres tall and produce around 6MW, causing greater impacts.

The outdated nature of these guidelines has been acknowledged in the Dáil multiple times. In 2013, Deputy Micheál Martin noted that the guidelines did not reflect modern technology, and in 2025, Tánaiste Simon Harris confirmed that the Government prioritizes the creation of new guidelines.

Therefore, it is inappropriate for An Coimisiún Pleanála to base decisions solely on the 2006 Guidelines. Decisions must reflect current technology and environmental standards. All new Wind Farm developments should be paused until updated guidelines are established so that affected communities are not unfairly treated by these outdated guidelines

### **Mid Galway Public Water Scheme**

I use the water from the Mid Galway Public Water Scheme as my main source of drinking water for my household. 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 karsified and hydrologically sensitive area.

### **Impact of Wind Turbines on the Neurodiverse within the Community**

Numerous studies and planning inspectors with An Coimisiún Pleanála have acknowledged that wind turbines can have negative effects on neurodiverse individuals. Research by Howell (2015) found that people with autism are more sensitive to environmental noise, experiencing higher rates of sleep disturbance, cognitive difficulties, and stress due to low-frequency noise (LFN). The neurodiverse community often struggles to filter background sounds, and constant turbine noise and vibration could cause pain, anxiety, and loss of concentration, reducing quality of life.

These impacts extend to education. Local schools and preschools, including Brierfield National School which has a special class for children with autism, would be particularly affected. Senior planning inspectors have previously noted that facilities for children with additional educational needs may become unviable near large-scale wind farms due to such disturbances.

Shadow flicker poses further risks, as studies (Becchio et al., 2010) show that individuals on the autistic spectrum may fixate on spinning movements, heightening distress. Those with epilepsy or neurological conditions may also be affected.

Ireland's obligations under the UN Convention on the Rights of Persons with Disabilities require protection from harm and equal enjoyment of rights. Allowing this development would contradict those principles.

While more research is needed, there is no definitive evidence proving that wind farms are safe for, and do not significantly impact, the neurodiverse community—and the absence of evidence is not evidence of absence.

#### **References:**

- An Bord Pleanála. (2016). PA0041 – Assisting report to Senior Inspector [PDF].  
<https://www.pleanala.ie/anbordpleanala/media/abp/cases/reports/pa0/rpa0041a.pdf>
- An Bord Pleanála. (2015). Inspector's report: ABP-PA0038 [PDF].  
<https://www.pleanala.ie/anbordpleanala/media/abp/cases/reports/pa0/rpa0038.pdf>
- Howell, G. (2015). Autism and the effect of introducing a new noise source into quiet rural communities: risk factor from industrial wind power generation
- Becchio C, Mari M, Castiello U (2010) Perception of Shadows in Children with Autism Spectrum Disorders. PLoS ONE 5(5): e10582.  
<https://doi.org/10.1371/journal.pone.0010582>

### **Biodiversity Impact - Bats**

I object to the Cooloo Wind Farm because the proposal fails to adequately protect bats, which are strictly protected under EU law. The developer's surveys show that several bat species, including the Lesser Horseshoe Bat, use the area leaving a real risk of collision, disturbance, and loss of important foraging habitat. As these impacts cannot be confidently ruled out, the project should be refused on the grounds of non-compliance with the EU Habitats Directive and insufficient protection of bats and their habitats.

### **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**

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,

A handwritten signature in black ink, appearing to read 'Lisa McMullin', written in a cursive style.

Name: Lisa McMullin

Date: 08 November 2025