

Luke Silke,
Cloondahamper,
Lavally,
Tuam,
Co. Galway
H54XN35

An Coimisiún Pleanála,
64 Marlborough St,
Dublin 1
D01 V902

Date: 21/11/2025

Re: Case Re: 323761 – Cooloo Wind Farm

Applicant : Neoen Renewables Ireland Limited

Site Location: Located within the townlands of Cloondahamper, Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally and Slievegorm, Co.Galway

Introduction:

My name is Luke Silke, I'm 27 years old and I'm from Cloondahamper, Eircode H54XN35, just over 1km from T7. I work in the Dáil as Secretary to the Aontú leader Peadar Tóibín TD and contested the most recent local elections in this Local Electoral Area. My family has lived in this area since well before the famine. I am a local historian and at the age of sixteen I wrote and published a book 'Cloondahamper A History', on the history of the townland. I also hold a degree in History from the University of Galway. I wish to object to this development for a number of reasons, but particularly on the grounds that public consultation was inadequate, that historical and heritage sites including a hill fort have not been examined nor has there been an assessment to determine what danger the development and associated construction poses to these structures, and because an area classed as a "Special Area of Conservation", according to an environmental / Appropriate Assessment conducted prior to recent improvement works to the river which flows through the area, is located either within or extremely close to the site boundary for this project.

The developer has not consulted me, nor have I ever spoken to any of their representatives, though a letter did arrive at my home addressed to my grandfather who has been deceased for the past 25 years. I believe that the public consultation process was inadequate. Like most families in the area mine owns a holding of bog in close proximity to turbine seven, though we do not know the folio number or co-ordinates of it. The bog is poor quality and hasn't been cut in years, and there are many families in the village who know that they own bog, but do not know where it is. I note that three of the proposed turbines are in land which is considered "generally unsuitable" for such developments, according to the County Development Plan.

Heritage Concerns:

The Cooloo, Barnaderg area is rich in heritage and like most areas in rural Galway attracts significant tourism during the Summer months – especially from people whose ancestors hailed from the locality.

I want to draw to your attention many historical sites of interest which are located in close proximity to the proposed development, but which are not marked on the maps produced by the developer.

These include the former hedge school located at 53.5111716 – 8.6734016, which is located 0.7km from turbine number 7. It is not marked in the Developers map, but is marked in older ordinance survey maps. The burial plot of a monk, who according to local knowledge died on a day when there was heavy snow and couldn't be transported to the graveyard so was buried at 53.5044248 – 8.6700220 known as the 'Bráthar's Grave' which is a mere 640 meters from turbine number seven.

There is a Children's Burial Ground located in Cloondahamper, a plaque remembering the children buried there is displayed on the grounds of Killrerin Church. This burial ground consists of a hallow in a hill with each grave marked by stones. It is located at 53.5067704 – 8.6731834, some 0.4km from turbine seven but is not marked in the developer's map. There are people alive in the village today who have siblings buried in that burial ground.

There is a further Children's Burial Ground known as the Killaughan which is located 53.5061189 – 8.6587611 which is 0.59km from turbine 9. This is located within a ring fort (centre point 53.5063568 – 8.6591638). According to local oral history a group of monks during the penal times buried their gold chalices, etc on this site, and it is considered haunted ground, with locals for centuries refusing to interfere with it.

In close proximity to this structure there exists a hill fort at 53.5072892 – 8.6572725 which consists of a hill with two hawthorn bushes on top of it. A stone wall runs up through the middle

of the fort. This fort has been subject to inspections by archaeologists in the past, though I don't believe excavation has ever been undertaken. This is 0.67km from turbine 9. Only one of these forts is marked in the developer's map.

The remnants of a famine road exist in Cooloo bog, which is barely identifiable today, but very visible in older ordinance survey maps. It is located at 53.4988926 – 8.6496624, some 0.43 km from turbine 9. This is not marked in the developer's map.

Given the intensity of local historical sites in this general area, and the vast amount of undisturbed bog which will be disturbed by this development, I am concerned that an adequate archaeological survey has not been conducted of the area, nor has the developer outlined what steps they are taking to ensure that no historical sites, such as the ones listed above, will face any destruction or damage as part of the construction of this development. I do not have confidence that adequate care will be taken to ensure no damage to these structures, especially in the context where they are not marked on the developer's map, and perhaps the developer does not know of their existence.

Water:

I am deeply concerned for the impact that this development will have on water in our area. 'Cooloo lake' (Co-ordinates: 53.4954111 – 8.6619392) is located a mere 480 meters from turbine 8, and in extreme proximity to the proposed new roads which will have to be built as part of this development. The bog in Cooloo is incredibly deep, and difficult to walk across without sinking. A friend of mine conducted an experiment (which we video recorded) to see how deep the bog was and how big a stick could be inserted into the ground. The conclusion of our experiment was that an average man could force a stick 10.5 meters into the ground with his own hands. This experiment was conducted on the exact site of the proposed new road connecting the turbines to one another.

The map shows that while no river flows into Cooloo lake, a small river flows out of it. This river crosses the road at Trasternagh North at 53.5004799 – 8.6419152, it picks up pace and water and crosses the road back again at 5.35087952 – 8.6579682, where it frequently floods when the weather is bad. It then crosses the road once more in the village of Cloondahamper. Again the river frequently floods in Cloondahamper, especially coming up to the point at which it joins the Grange River which ultimately flows into the River Clare.

In 2021 some €82,000 euro was awarded to Inland Fisheries Ireland under the Habitats & Conservation Call 2021 (announced in August 2021), Salmon and Sea Trout Rehabilitation, Conservation and Protection Fund (SSTRCPF) and The Midlands Fisheries Fund (MFF) for the purposes of Riparian enhancement works on drained channels of the Cloondahamper and

Sinking Rivers on the Clare River, Co. Galway to improve available habitat for salmon and sea trout at all life stages.

Significant work was undertaken on the river in the months ensuing. This, I stress, is the river which begins at Cooloo lake in Cooloo bog where many of these turbines are going.

I am deeply concerned about what will happen if a turbine goes on fire and what chemicals may end up in this river and the impact that will have on fish stocks. I am concerned about what disturbances could occur during the construction phase, and the quantity of concrete which will be required for the road through the bog and the foundations for the turbines. Removing peat and replacing it with concrete could raise the water levels in the bog, in Cooloo lake, and ultimately in the Cloondahamper, Grange and Clare rivers. A faster flowing, or deeper river could remove or damage some of the enhancement works which were undertaken on the river. I do not believe the developer has undertaken an assessment on the impact the construction of turbines, foundations and roads in the Cooloo area will have on fish stocks in the Cloondahamper river, and as such I would ask that refuse planning permission for this project.

I want to reference an Appropriate Assessment (AA) commissioned by Inland Fisheries Ireland as part of the works. The assessment was conducted by INVAS Biosecurity and is titled "AA Screening & Natura Impact Statement for the Grange River Enhancement Plan in the Corrib catchment" dated to May 2021. It was prepared by Dr William Earle, checked by Tom Donovan and approved by Prof. Joe Caffrey.

I include below an image taken from this Appropriate Assessment which marks out the Special Areas of Conservation near the river (they are marked with red shading). The red shaded area to the bottom right of the map, marking a Special Area of Conservation, to my reading of the map falls within, or extraordinarily close to, the site boundary for the Cooloo Windfarm to the northeast of turbine seven. This, I find to be extremely concerning. I am very concerned for what impact this development will have on that Special Area of Conservation.

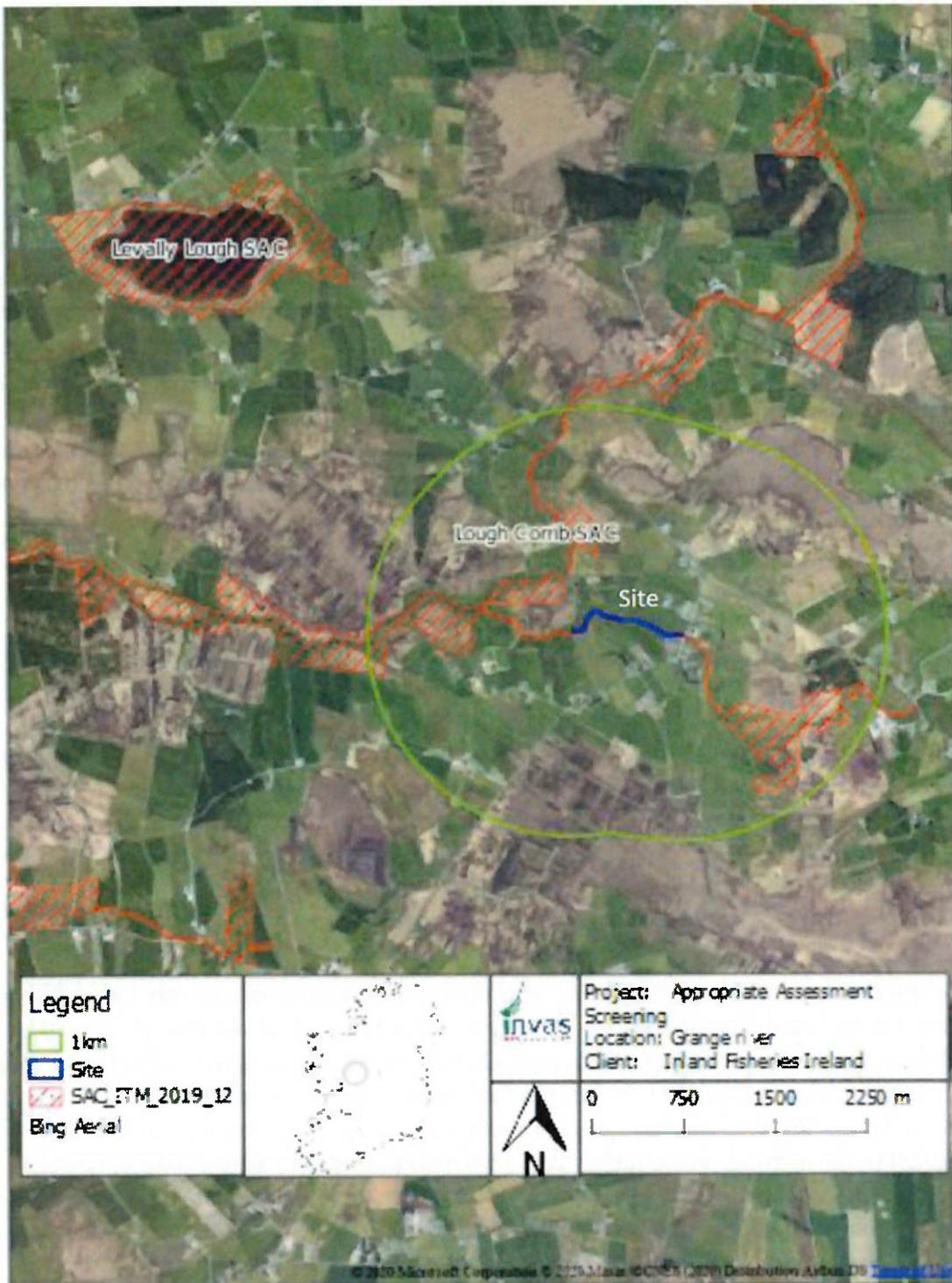


Figure 3.1: Special Areas of Conservation (SAC) beyond 1km of the proposed work site.

The significant level of tree-felling and removal of peat required for this development are of huge environmental concern to me, especially in the context of the global climate emergency. The bog acts as a sponge to hold water and mitigate against flooding, it also stores carbon which would otherwise be released into the atmosphere. Some of the bog land located inside the site boundary has gone undisturbed for a hundred years and looks as though it has never been cut or interfered with. The replacing of parts of this bog with concrete foundations and roads will leave a not insignificant carbon footprint and may lead to flooding in the area.

In August 2024 the EU Nature Restoration Law was enacted which requires Ireland to restore degraded ecosystems. It is legally binding and Ireland will have to rewet 7.5% of land by 2030, 25% by 2040, and 35% by 2050. I have attended a public meeting hosted by the Irish Farmers Association in conjunction with the Department in the locality – in the parish of Lavally – where the proposals around Rewetting the Bogs were discussed. At that meeting local farmers were told that it would be possible to meet these targets without having to make rewetting mandatory for agricultural land. We were told that there was enough disused bog or publicly-owned bog or farmers willing to sign up to ensure that these targets could be met without having to force farmers against their will to rewet the land they are farming. The Minister has said the same – I reference an article published in the Irish Independent on 24th May 2023 titled “Farmers will not be forced to rewet their land, Minister pledges”.

My concern here is that if a windfarm company is to hold power and control over bog lands in the Cooloo / Cloondahamper area, which constitute disused bog lands, then will they prevent these bogs from being rewetted, or will the development itself render the land unsuitable for rewetting and what impact would this have to the threshold by which Ireland is set to meet its targets under the Nature Restoration Law without having to resort to making rewetting mandatory for farmers. In short, I am concerned that a reduction in the amount of available disused bog may mean rewetting must become mandatory in order for the targets to be reached. If this were to happen, as a result of this development in Cooloo, it would have huge ramifications for farmers right across the entire country.

I note also that approximately 50 hectares of the proposed development site lie within the Mid-Galway Public Water Supply Source Protection Area (SPA). Two turbines (T1 and T2) and a temporary construction compound are proposed inside this drinking water protection zone. The EIAR itself acknowledges that the Barnaderg GWS shares the same groundwater zone of contribution as the Mid-Galway PWS. The EIAR concedes that deep excavations for turbine foundations, dewatering, and grouting “could have the potential to significantly affect flows to the source springs” supplying the Mid-Galway PWS. These springs are karst-fed, and thus highly sensitive to disturbance or contamination. Any alteration to groundwater flowpaths or pressure gradients could disrupt the source yield or introduce pollutants directly into the drinking water system. Despite this, the developer proposes to construct large turbine bases (3–3.5m deep) and other infrastructure directly within the SPA — an inherently high-risk and inappropriate activity in a regionally important aquifer with “Extreme” groundwater vulnerability.

Public Consultation:

As someone who works in the field of politics/ public service, I found the public consultation process to be wholly inadequate. Not in all my years working in Leinster House have I seen such an inadequate public consultation process. Over the past number of weeks, I have spoken to hundreds of people living in the area, most of whom had not been consulted as part of the development, including a woman who lives just 720 meters from Turbine 7. I find this to be extraordinary and unforgiveable.

A number of public meetings have been organised by members of the community who are opposed to this development. These have been very well attended, as have protests against this development outside our national parliament. At these public meetings I have not heard anyone articulate an opinion in favour of the development – the vast community consensus is against this development, indeed in my experience canvassing prior to the recent local and general elections I did not encounter a single person who said they were in favour of the development. The number of submissions made against this development must be taken into consideration by An Coimisiún Pleanála. I would urge you to calculate and consider also what percentage of TDs representing the Galway East area have made a submission against this development. They were elected to represent the views of the majority of people in this area.

I refer to an exchange in the Dáil during Leaders' Questions on 21st May 2024 during which the Taoiseach said that the government "will engage with communities and work to have a replacement for the 2006 wind guidelines later this year" (2024). We know that this didn't happen, but we know that the government at that time, and the current government are of the view that the 2006 guidelines are outdated and need to be updated – a commitment is made to do this in the current government's programme for government. The developer should have taken the views of the community, and the view of the government as articulated by the leader of the government in relation to the guidelines, into consideration before ramming this proposal through under the provisions of the current guidelines, which the mandated government of the people of this country believe to be outdated and requiring revision or replacement.

The developer in this instance claims to have engaged with "local groups, clubs and schools", but I have spoken to local schools, Killrerin GAA Club and Killrerin Community Council, and can not find evidence of engagement. I believe the claim of engagement by the developer to be untrue. This is a very serious matter.

I would ask An Coimisiún Pleanála to take my serious concerns and objections into consideration and to refuse permission for this development.

Yours Sincerely,

Luke Silke