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| An Coimisiún Pleanála - Case reference: | PAX07.323761 |
| Name of Proposed Development | Cooloo wind farm |
| Description of Development | Construction of wind energy development and all associated works |
| Location Of Development | located within Cloondahamper, Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eigher, Lissavally and Slievegorm, Co.Galway |
| Name of Development Applicant | Neoen Renewables Ireland Ltd Ferry House, 1 st Floor (Rear) 48-53 Lower Mount Street D02 PT98, Dublin 2 |

Observer details

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| Observations by: | Margaret Collins |
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| Date of observation | 20/11/2025 |

The Objection

I strongly object to the proposed development of these Wind Turbines (WT) and am deeply concerned about the irreversible impact that this would have on the local rural character and the detrimental effect on the environmental & social sustainability of our area. The following are identified as some of the key objections.

Location, which will affect the following,

- *Environmental Impact*
- *Health & Wellbeing*
- *Infringement of Rights*
- *The risk to the water and marine environment*
- *Reduced property value*
- *Road Safety*

And also, object to the,

- *Lack of communication and transparency and,*
- *The Turbines Height*

Location

Environmental Impact

The selection of this area for a proposed wind farm is inappropriate. *Climate change is resulting in the destruction of our lands and territories, natural ecosystems, livelihoods and cultural and spiritual connections to the earth. We are also confronted with an energy transition that, so far, repeats the mistakes of the past, through massive exploitation of our resources, entrenching of inequalities and trampling over our rights.* (Business & Human Rights Resource Centre , 2025)

Not only is the proposed area within an area of virgin peatland but it is within or close to areas of major environmental protection.

The development will consist of 9 turbines of a massive scale, bigger than anything currently existing in Ireland that will be placed between the Special Area of Conservation SAC of Levally lough, PA 000295 and the Horseleap lough, adjacent and very close to the Derrynagran Bog and Esker NHA, and through the lough Corrib SAC, SPA 004042 . These areas are

considered important habitats which holds species of plants and animals whose habitat needs protection.



Figure 1: Birdwatch Ireland sensitivity to wind map

The above image shows the Birdwatch Ireland sensitivity to wind map shows areas highlighted in pink. Birdwatch Ireland have been contacted to clarify the rational for leaving areas between wintering wetland areas which protected migratory birds use as a flight path and the omission of areas that are part of a SPA open for development. (I personally see many birds such as wild Geese, Swans, Ducks, Herons, Buzzards, Skylarks and others that I don't see, but every summer their sound will announce their arrival such as the Cuckoo and grasshopper warbler) The creation of a wind farm at this location is potentially creating the perfect bird/bat kill zone beside areas of conservation. The use of this area acts in contravention of Habitats Directive, which was adopted by the EU in 1992, Under the 1992 EU Habitats Directive, Ireland is required to protect species and habitats of international importance. Raised bogs have been designated for protection.

Annex I

Covers ecologically important habitat types which require special protection as SPAs. **Habitats include raised bogs and blanket bogs.** Some of these sites are known as 'priority habitats' for which there is a particular obligation for protection.

Annex II

Covers animal and plant species which require special protection as SPAs.

Under the EU Birds Directive. Not only are wetland sites important for resident Irish birds, but they are also of international importance for migratory species (Note location of proposed wind farm falls under the Court of Justice of the European Union). The EU believes that protecting and restoring peat bogs will help Ireland to meet its climate-change goals by keeping peat in the ground (Not the large-scale removal proposed under this development. The EU is the second largest global emitter of greenhouse gases (GHG) from drained peatlands (230 Mt CO₂eq/year = 15% of total global peatland emissions). (Peatlands in the EU Nature Restoration Law – a Factsheet, 2022) Raised bogs are a rare habitat in the E.U. and one that is becoming increasingly scarce and under threat in Ireland. This high bog supports a good diversity of raised bog microhabitats and must be protected.

Health & Wellbeing

The second aspect of the unsuitable location is the proximity to residential properties. The placement of such extremely large wind turbines greater than 180m in close proximity to Irish homes has not been studied, and all information pertaining to setback distances are based on outdated studies that do not fit the parameters of the proposed windfarm.

The World Health Organization set a target of 40 dB as the maximal permissible noise level to which the people should be exposed at night, the effect of noise to cause a nuisance cannot be accurately predicted by the current research as the noise propagation models are based on distance however the noise level not only depends on distance, but also on site-specific details, such as background noise levels, topography, building materials, and wind velocity/direction. (Peri, 2021) *Symptoms of WT noise have been studied. These studies revealed a pattern of stress symptoms due to WT noise including sleep disturbance, irritability, negative mood and a lack of concentration* (Hübner, 2019)

Furthermore, current research would indicate that current thinking is outdated in relation to set back distance, *While the larger turbines expected to be deployed in the future are more powerful and efficient, they are also expected to operate at higher sound levels and require larger setbacks than those installed in the last decade.* (Hoen, 2023).

Another area of concern based on the close proximity to mine and other properties is the nuisance of Shadow Flicker (SF). The implications based on my property's orientation is that the main living areas namely the Living room, Sunroom and Kitchen Dining area shall be exposed directly. And secondly the visual disturbance shall be projected onto the low-lying land to the rear of the property which will alter the calm of beautiful countryside view.

The current method of modelling shadow flicker has been noted to be weak as it does not take account of variables that impact results and its predictive strength is only at 10% (Voicescu, 2016).

The models would benefit by considering variables that were not addressed in the current study. These may include, but not be limited to, personality traits, attitudes toward WTs [wind turbines], and the level of community engagement between WT developers and the community (in my case zero engagement), And additionally, it is important to mention that the SF model only accounts for SF duration and not shadow intensity. An assessment of SF intensity could potentially strengthen the association between SF exposure and community annoyance. (Voicescu, 2016)

The fact remains that the annoyance caused by SF has and is documented with a direct relation to increased stress though not fully reported due to the development of coping mechanisms.

The installation of these wind turbines in such close proximity to mine and other peoples homes will have a significant impact on the health and wellbeing of the people affected. As per (Jeffery, 2013) *Canadian family physicians can expect to see increasing numbers of rural patients reporting adverse effects from exposure to industrial wind turbines (IWTs). People who live or work in close proximity to IWTs have experienced symptoms that include decreased quality of life, annoyance, stress, sleep disturbance, headache, anxiety, depression, and cognitive dysfunction. Some have also felt anger, grief, or a sense of injustice. Suggested causes of symptoms include a combination of wind turbine noise, infrasound, dirty electricity, ground current, and shadow flicker. Family physicians should be aware that patients reporting adverse effects from IWTs might experience symptoms that are intense and pervasive and might feel further victimized by a lack of caregiver understanding.*

The potential for this wind farm to adversely affect the health and wellbeing of mine and my neighbours due to the close proximity is real and as such has already caused great mental anguish and should never have been allowed to progress to this stage.

Infringement of Rights

The fact that many like I spend a considerable amount of time working from home. The potential for these WTs to have a detrimental effect on workplace performance and cannot be discounted. The above-mentioned issues coupled with interference from various sources (electromagnetic interference & blocked signals) may affect my livelihood. The Irish

government under its own constitution has an obligation to protect my right to work and earn a livelihood from unjust attack. The wind farm in such close proximity to home has the potential to breach this and other rights,

Universal Declaration of Human Rights (United Nations, 2025),

No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment. The potential for issues arising based on the worst-case data which could lead to living at my home becoming unbearable.

All are equal before the law and are entitled without any discrimination to equal protection of the law. All are entitled to equal protection against any discrimination in violation of this Declaration and against any incitement to such discrimination. The report from Neom stated that the area was selected as it was a rural area with a low population density, the community had zero say in the selection and is ultimately being discriminated against for being rural low population area made up of primarily farming peoples.

Everyone has the right to an effective remedy by the competent national tribunals for acts violating the fundamental rights granted him by the constitution or by law. The lack of regulation and outdated guidelines and methods of study of the effects on the population and the government introduction of laws that circumvent the rights of the individual under the guise of the greater good clause that allow for the bypassing of local planning has not gone unnoticed.

No one shall be subjected to arbitrary interference with his privacy, family, home or correspondence, nor to attacks upon his honour and reputation. Everyone has the right to the protection of the law against such interference or attacks. As stated above the implications against my property may reduce the value, render it unsellable or in the worst case uninhabitable.

Everyone has the right to own property alone as well as in association with others. No one shall be arbitrarily deprived of his property. As stated above this is a very real possibility.

International Covenant on Economic, Social and Cultural Rights (ICESCR) (UN High Commissioner, 1976)

The States Parties to the present Covenant recognize the right of everyone to the enjoyment of just and favourable conditions of work which ensure, in particular:

Safe and healthy working conditions; If my home and I are badly affected then it will not be met.

The States Parties to the present Covenant recognize the right of everyone to the enjoyment of the highest attainable standard of physical and mental health. The actual effect on mental health began with allowing for such extreme wind turbines even to be considered, the evidence shows that those in close proximity to wind turbines (much smaller) have noted negative implications.

The risk to the water and marine environment

The potential to adversely affect the ground water thus the wider drinking water for much of Galway is a risk that is unacceptable. The construction activities and removal of peatlands will invariably affect the ground water. The depth of excavations has the potential to reach aquifers and alter natural water flows, the removal of peat will release vast amounts of water, the removal from one location to the other will not be in watertight vehicles which will be leaking along the extent of the proposed roadway.

The excavations will release naturally occurring contaminants and coupled with rainwater runoff or an accidental spillage on the site has the potential to cause a major environmental impact and reduce or harm the quality and safety of the drinking water used by a large area of County Galway including all of Galway city.

Given the location of the proposed site is within the Lough Corrib SAC (000297), the international importance of protecting the area for marine life especially to wild salmon as Europe's migratory freshwater fish population has fallen by 93% over the past fifty years (Europe, 2022). In Ireland the impact is greater where salmon numbers have plummeted from 1.76million in 1975 to just 171,700 in 2022 – a unimageable drop of more than 90%. Migratory Fish play a critical role in keeping our rivers, lakes and wetlands healthy by supporting a complex food web, Migratory fish are species with old habits; many have been using the same migratory routes for centuries, and therefore the rapid changes of river environments impact them significantly it is vital that this eco system be protected.

Reduced property value

The creation of the wind farm within such close proximity to my home will have a direct effect on the value of my property. The current literature in relation to the adverse effects on property values due to proximity to wind farms in Ireland does not meet the requirements of this wind farm as no other wind farm has been built or studied of the proposed height.

The studies that have been conducted are based on existing wind turbines and approximated for above 125m. What the data shows as per (McHale, 2023) is that there is a direct correlation in house price reduction and wind farm location and turbine height with properties within the 1 to 2km being the most effected.

The current percentage reduction and analysis is flawed for a direct comparison as the proposed wind turbines exceed the height of any existing studies, furthermore the current studies have not taken account of increased sale time. However as a guide based on the prior data (McHale, 2023) rural areas with moderate urban influence which seen a reduction 20.1% of property value at the 1 to 2km distance from the WT shall be applied and adjusted for height.

A minimum estimate on the impact on the value of my property shall be given at 25% , this is considered to be on the lower scale as there is no comparison for turbines of this height being located in such close proximity to residences in Ireland and as per the current literature height and location is the greatest driver in loss of monetary value. As there is no reliable data to compare with the effect of wind farm on my property has the potential to reduce the value significantly or potentially render it unsellable.

Based on 25% the Insurance rebuild cost as per **Appendix A** from the Society of Chartered Surveyors Ireland (SCSI) the potential loss against my property is €223,532.50. note this cost does not include site value.

Road Safety

The roads and construction will create dust and traffic which will increase the danger to residents. The long-term implications are however more severe as the road particularly from Béarna Dhearg to Cloondahamper has sheer drops on both sides of the road with very narrow verge margins that are already prone to cars leaving to road going into drains. The introduction of extremely high WT will cause external distractions, from prior studies WT distractions seen accidents recorded at 117.4% increase in severe injury crashes and a 25.7% rise in property damage only near wind turbines (Alhomaidat, 2025), it must be noted that this study was along

a highway. The road conditions around the proposed wind farm are far from ideal the introduction of obvious distraction particularly at the end of major junction such as horse leap cross will lead to accidents via distraction. The N63 is a regional connector route.

As per the Spatial Planning and National Roads for Planning Authorities 2012

- promotion of patterns of land use change that minimise adverse transport effects,
- provisions, including zoning and standards, which ensure that land uses in the vicinity of the network are compatible with the safe and efficient operation of national roads and associated junctions.
- ensuring high standards of safety for road users.
- protection of the identified preferred route corridors for future national road schemes; and
- policies and objectives that require developers to avoid, remedy or mitigate the adverse effects of their development on transport systems and/or infrastructure, including national roads, and provide mechanisms requiring developers to make reasonable contributions towards the costs of any required mitigation, alterations or capacity enhancement works to transport systems and/or infrastructure

Lack of communication and transparency

The company Neoen has not visited me at my property; their idea of community engagement is a leaflet with the bare minimum of information on it.

The information from the prior planning has been misleading. The initial information pertaining to the pre- consultation for the development, An Coimisiún Pleanála - Case reference: PC07.316466, stated that the *Cooloo Windfarm consisting of 9 no. wind turbines with an estimated **maximum** energy capacity of c. 54MW.*

The company then proceeded to apply to An Coimisiún Pleanála - Case reference: PO07.322632, Design Flexibility Consultation dated 10th July 2025. Under the new proposal the prior maximum energy capacity of 54MW would now be the minimum capacity and a new maximum capacity 64.8 MW would be introduced, Neoen within its presentation to An Coimisiún Pleanála has indicated that the primary factor for this change is to facilitate Turbine selection, yet why stipulate a minimum capacity unless profit is not the motive, they may argue that Strategic Infrastructure Development (SID) threshold is 50MW so with the change they can bypass local planning .

An Coimisiún Pleanála - Case reference: PAX07.323761

However, this change is an obvious attempt to insert much larger generators past the community, thus maximising profit for the developer at the expense of the local community. An Coimisiún Pleanála has agreed to the change of much larger generators, the question will remain if An Coimisiún Pleanála fully understands the implications of larger generators via increased noise on the community, Turbine rotational speed have decreased over time, blades have been getting larger with increased tip speeds thus increased turbine sound power levels. Furthermore It is quite clear that proven safety of newer designs is not the driving factor and that it is profit driven with an extreme size or nothing approach.

The company Neoen continues to purposely mislead with the current application An Coimisiún Pleanála - Case reference: PAX07.323761

Where they state the Total Turbine Tip height of 180m however, this is not the total Tip height, given that the HUB height can be 99 to 105m and the blade diameter can be 150 to 162m, the total height in reality is 186m, nominal in this instance is 180m.

The Turbines Height

The visual impact of these turbines will be far reaching, due their height they will dominate the landscape. The height makes a mockery of years of restrictive planning by Galway County Council that has ensured that the landscape has been protected. The eastern and northern parts of county Galway have seen years of economic decline. These areas have never benefited from the impact of tourism or economic growth as years of promotion and government funding was directed towards the western coastal areas and main urban centre of Galway city. The hopes of community groups and activists within these areas was that with leadership and funding it would allow for future development of this untapped potential and with the growth of an indigenous tourism industry it would bring much needed employment and economic benefits.

The development of these wind farms will act as a further barrier for tourism development as they will have a negative impact on our environment landscape and scenery.

The decisions that were made to select this location has showed the contempt for the local population after years of government neglect, purposely selecting the tallest wind turbines, with larger outputs, locating them close to dwellings and areas of conservation is a just another example of the inequality faced by this region.

Conclusions

The visual impact of these turbines will be far reaching, due their height they will dominate the landscape. The height makes a mockery of years of restrictive planning by Galway County Council that has ensured that the landscape has been protected. The eastern and northern parts of county Galway have seen years of economic decline. These areas have never benefited from the impact of tourism or economic growth as years of promotion and government funding was directed towards the western coastal areas and main urban centre Galway city. The hopes of community groups and activists within these areas was that with leadership and funding it would allow for future development of this untapped potential and with the growth of an indigenous tourism industry it would bring much needed employment and economic benefits.

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Appendix A



SCSI

The best property, land and construction surveys

Calculation of House Rebuilding Costs for Insurance Purposes (2025/26)

This document is a summary of the data provided as part of the SCSI Calculator. Please ensure that the assumptions are appropriate for the house type you are entering, and that you are using a highly skilled professional for property, land or construction by checking if they are Chartered at <https://scsi.ie/Find>

Calculator Completed on 12/11/2025 10:49

Assumptions

The rebuilding rates are for spec/average built houses in the Dublin Region. The figures in the table provide an estimate of the cost for you to rebuild your house, assuming a standard level of finish and materials as per the table. The figure excludes a double garage, stone or brick walls, concrete foundations, timber frame or brickwork walls, cladding, slate/concrete tiled roof, concrete ground floor and timber first floor, softwood flush doors and double glazed windows, painted plaster to walls, plastered ceilings and standard kitchen. Heating and Electrical systems are included, electrical services are at a standard level, construction is standard, and ventilation and heat pump to meet BREEAM ratings. The sum insured should be increased to allow for better than average kitchen fittings, built-in wardrobes, showers and any other items not normally included in an average type house. House costs are not covered by the figures, which are capped, unless included in the table. There are other charges/fees payable under the construction of the house, such as planning fees, which should be added with a best estimate cost into the calculator if you select rebuilding costs including a garage. The prices estimated are €27,300 for a single attached garage and €40,000 for a double attached garage.

| Name | Option/Unit | Total |
|------------------------------------|---|-------------|
| House type | Detached 4 bedrooms / typical size 113 sq. m. | |
| Gross Internal Floor area (sq. m.) | | 273 sq. m. |
| Separate Garage | | € 21,000 |
| Add For Higher Than Average | | € 10,000 |
| Additional Expenses | | € 35,000 |
| Cork Region | | € 910,518 |
| Dublin Region | | € 1,019,436 |
| Galway Region | | € 994,130 |
| Waterford Region | | € 917,330 |
| Limerick Region | | € 990,030 |
| North West Region | | € 840,900 |
| North East Region | | € 974,000 |
| F 6506313 | | |