Mike McGoldrick

Hillsbrook

Barnadearg

Tuam

County Galway

H54YK71

20th November 2025

Observation/Submission of Mike McGoldrick to An Coimisiún Pleanála on

Case Ref: PAX07.323761

Description : Direct Planning Application to An Coimisiún Pleanála in Respect of a **Strategic Infrastructure Development in County Galway** for a ten-year planning permission for the construction of 9 x in number Wind Turbines together with significant associated Developments in the townlands of Cloondahamper (Blake), Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally and Slievegorm in County Galway comprising a "renewable energy development" as defined by The European Union (Planning and Development) (Renewable Energy) Regulations 2025 and in respect of which Permission for a 35-year operational life is sought from the date of commissioning.

Application of: Neoen Renewables Ireland Ltd of Ferry House, 1st Floor (Rear), 48-53 Lower Mount Street, D02 PT98, Dublin 2.

Submission of: Michael McGoldrick, Hillsbrook, Barnadearg, Tuam, County Galway - H54YK71

I welcome the opportunity to make a Submission to An Coimisiún Pleanála on this Application for Planning Permission & Development Consent for a Wind Energy Development together with significant associated Development Works, incorporating significant Infrastructure Works, all of which require the making of a Determination in accordance with the requirements of the EU Environmental Impact Assessment Directive and the making of separate Determinations in accordance with the requirements of both the EU Habitats Directive and EU Birds Directive.

PRELIMINARY: Upon reading and considering the Site Notice for this proposed Development, as published in The Connacht Tribune and Irish Examiner on Friday 26th September 2025, I am informed that this Application may be viewed and inspected at a number of locations, including, at the offices of **An Coimisiún Pleanála** and of **Galway County Council**. Both I and members of the public are also advised that the Planning Application, the EIA Report and the Natura Impact Statement may also be viewed/downloaded on the Applicant Developer's website on www.cooloowfplanning.com

I refer you to the text of that part of the Notice of Application advertised by the Developer (see screenshot below), as published in The Connacht Tribune and Irish Examiner on Friday 26th September 2025 advising that both I and all interested Parties may gain access to *"the Application"* at *"www.cooloowfplanning.com"* at which Website the Application may be *"viewed/downloaded"*. Unfortunately, and despite thorough searching of the Developer/Applicant Website, I can find no trace of the **Natura Impact Statement** (NIS) being made available, either to me or to any other member of the Public, despite the Applicant-Developer Website purporting to make the **Natura Impact Statement (NIS)** available via a specific link at the top of a list of documents being made available to 'the Public'. This document, **the NIS**, and the information contained therein representing the Environmental Information upon which I and others may make Submissions, represents the statutorily required Environmental Information, upon which, I understand that an Appropriate Assessment must be conducted by **An Coimisiún Pleanála (ACP)** prior to **ACP** either granting or rejecting Development Consent for the Applicant's proposed Development.

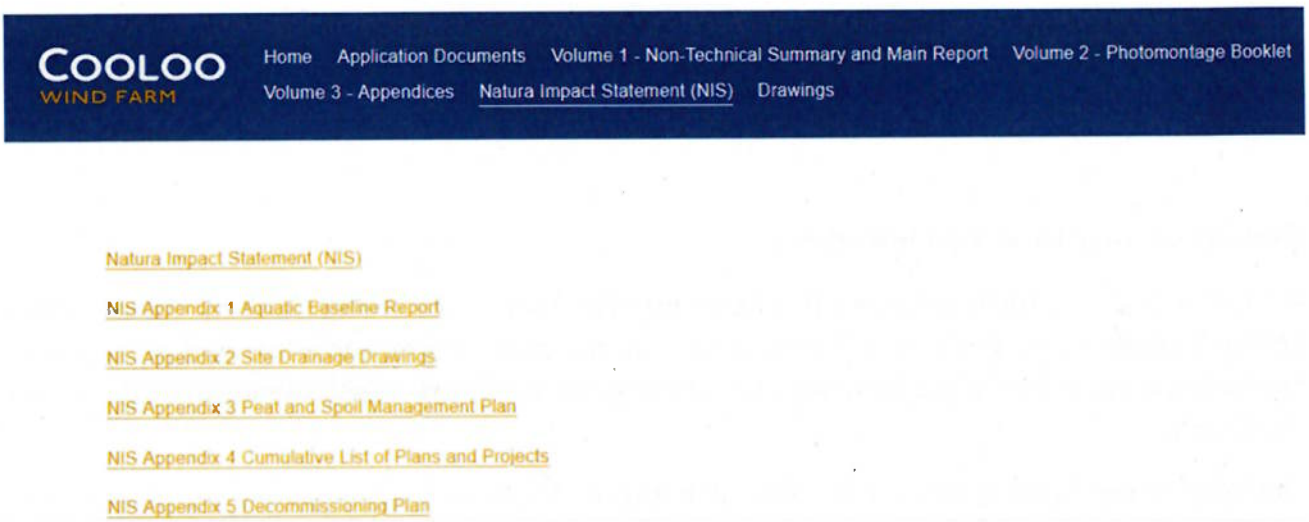
Screenshot Extract from Connacht Tribune edition of Friday 26th September 2025

The planning application, EIAR and NIS may be inspected free of charge or purchased on payment of a specified fee (which shall not exceed the reasonable cost of making such a copy) during public opening hours for a period of seven weeks commencing on the **3rd October 2025** at the following locations:

- **The Offices of An Coimisiún Pleanála, 64 Marlborough Street, Dublin 1, D01 V902 (9:15am - 5:30pm, Monday - Friday).**
- **The Offices of Galway County Council, Áras an Chontae, Prospect Hill, Galway (9:00am- 4:00pm Monday- Friday).**

The application may also be viewed/downloaded on the following website: **www.cooloowfplanning.com**

Screenshot Extract from Applicant-Developer Website as of Sunday 16th November 2025, specifically, that part of the Website that relates to the Natura Impact Statement (NIS) - (underlined in heading).



As of the evening of Sunday 16th November 2025, the document titled *"Natura Impact Statement (NIS)"* is not made available to me or to the Public through the link mentioned in the Screenshot (above) and the document that is actually made available, upon clicking on the heading entitled *"Natura Impact Statement (NIS)"*, is the document listed in the Appendices as *"NIS Appendix 4 Cumulative List of Plans and Projects"*. Upon searching through each Web-link listed on the Screenshot (above), I have discovered that **NIS Appendix 4** has been posted twice to the Website while the document sitting at the top of the list of documents, the **Natura Impact Statement (NIS)** itself has been omitted and the **NIS Appendix 4** is made available twice and mistakenly posted to and at the place where the **NIS** should (and **must**) be made available.

Accordingly, while all documents referred to as Appendices to the **Natura Impact Statement (NIS)** are made available to the public, the actual **Natura Impact Statement (NIS**) itself is **NOT** made available to me or to the Public in accordance with the direction issued to us by the Public Notices and accordingly, I submit that in the absence of the **Natura Impact Statement (NIS)** clearly being made available to me and to other members of the Public, this Application for Development Consent, **Case Ref: PAX07.323761,** must be rejected and returned to the Applicant-Developer with a Direction that this Application be re-advertised for Public Consultation and re-submitted to An Coimisiún Pleanála as a new Application for Development Consent.

Notwithstanding what I have set out above, I discovered late in the evening of Sunday 16th November 2025 that the **Natura Impact Statement (NIS)**, being a very extensive 172-page document is made available to the Public via the An Coimisiún Pleanála website. That I have managed to discover this document does not detract in any way from what I have set out above insofar as I could not even begin to read and comprehend the contents of the NIS and of the Appendices thereto until now, beginning only 5 days short of the Closing Date for receipt of Submissions when this Document should have been compulsorily made available to myself and to members of the public since the beginning of October.

I therefore believe and so submit that the entire of the Project documentation **must** be returned to the Developer, with a **Direction** to the Developer that the Project be re-advertised and resubmitted to An Coimisiún Pleanála.

Galway County Development Plan:

APPENDIX IV of the **Galway County Development Plan 2022 -2028** entitled **County Galway Wind Energy Strategy** clearly states that *"The Strategy provides strategic direction to encourage renewable energy and to guide the siting and design of wind energy developments in appropriate locations within the County."*

This Wind Energy Strategy (WES) goes on to state that it: *"provides a set of policies and objectives to guide the development of wind energy projects and support infrastructure in appropriate locations in a manner that capitalises on the substantial wind resources and avoids significant adverse effects on the environment, landscape or amenities in the County."*

The WES states that it: *"designates strategic wind farm development areas in terms of their suitability for wind farm development based on strategic analysis in relation to wind resources, natural heritage designations, landscape sensitivity, infrastructure capacity, settlement growth and amenity considerations."* And then goes on to say that:

"The WES provides guidance in relation to the capacity of the various Landscape Character Areas (LCAs) in the County to accommodate wind farm developments, together with guidelines on the assessment, siting, design, construction and operation of wind energy developments."

This County Galway Wind Energy Strategy (WED) was formulated following a Strategic Environmental Assessment and Natura Impact Assessment and the SEA Environmental Report and Habitats Directive Assessment Natura Impact Statement are annexed to the Policy.

This Galway Wind Energy Strategy publishes a Table providing a summary of the Strategic Wind Farm Development Areas identified in the County with the colours in first column matching those on Map WE-5A to WE-5F annexed to the WED and I set out this Table below.

Although the Galway County Development Plan 2022 - 2028 significantly increased the amount of Land zoned as permissible for Wind Energy in North East Galway in the Galway County Development Plan of 2022- 2028 there remains a significant area of land in North East Galway that is designated as "Generally to be discouraged" in substitution for the terminology of "Not normally permissible" that was applied in the Development Plan of 2015 – 2022. In essence, these 2 terms mean the very same and that Wind Farms should not be (either) encouraged or permitted in these areas of County Galway. It is in these circumstances that the Developer has applied for Permission for 9 Turbines, 6 of which are to be open to consideration and 3 of which are sought to be Permitted and constructed on lands "Generally to be discouraged".

Contrary to the views expressed by the Developer in its Application documentation, there are a significant number of reasons why, not only should 3 of the 9 Turbines for which Permission is sought be refused but the remaining 6 Turbines should also be refused because the majority of these 9

Turbines are proposed to be constructed on Karst Limestone, a Priority Habitat in accordance with the provisions of the EU Habitats Directive of 1992.

Strategic Wind Farm Area	Description and Guidance	Location	Area (ha)	% of Total	Potential Total MW Output	Target MW by 2020
SA – Strategic Areas	Large area in most suitable location for wind farm development and without significant environmental constraints, based on strategic-level analysis. Wind farm developments will be encouraged in this area subject to detailed environmental and visual assessment and appropriate layout and design.	LCA 10 in west of County	5,390	1%	600 (140)	220 (140)
AP – Acceptable in Principle Areas	Smaller areas in suitable locations for wind farm development and without significant environmental constraints, based on strategic-level analysis. Wind farm developments will be facilitated in these areas subject to detailed environmental and visual assessment and appropriate layout and design.	LCA 10, 11, 12, 16 & 17 in west	6,510	1%	480 (40)	100 (40)
OC – Open To Consideration Areas	Areas with some locations that may have potential for wind farm development due to viable wind speeds or clustering with Strategic Areas but with significant environmental constraints, based on strategic level assessment. Wind farm developments in these areas will be evaluated on a case by case basis subject to viable wind speeds, environmental resources and constraints and amenity, safety and cumulative impacts.	LCA 1, 3, 4, 5, 6 & 13 in east LCA 9, 10, 12, 16 & 18 in west	107,965	18%	480 (55)	60 (55)
NP – Not Normally Permissible Areas	Areas generally not suitable for wind farm development due to their overall sensitivity and constraints arising from landscape, ecological, recreational, settlement, infrastructural and/or cultural and built heritage resources, based on strategic level assessment. Wind farm developments in these areas will be discouraged, unless project level HDA and EIA can demonstrate to the satisfaction of the planning authority that environmental and other impacts can be successfully avoided, minimised and/or mitigated.	LCA 1-8 & 13 in east LCA 9-12 & 14-25 in west	298,125	48%	(120)	(120)
LW – Low Wind Speed Areas	Areas with wind speeds less than 8m/s that would generally not provide viable locations for commercial wind farm developments.	LCA 1-8 & 13 in east LCA 11 in west	196,403	32%	0	0
Total	–	–	614,393	100%	1,680	500

Note: Figures in brackets indicate MW of wind energy from existing and permitted wind farm developments.

Turning to:

An Coimisiun Pleanala Opinion on Flexibility – Ref No: ABP-322632-25

The Design Flexibility sought by the Developer and granted by An Coimisiun Pleanala (ACP) by Chris McGarry on behalf of ACP on 17th September 2025 whereby the Developer sought and was granted a "Flexibility Consent" in respect of both rotor diameter and hub height until after any Permission might be granted by ACP for the Development, grants to the Developer a flexibility in terms of the radius of each blade of 6 x Meters with the Hub Height being anywhere between 99 and 105 Meters above ground.

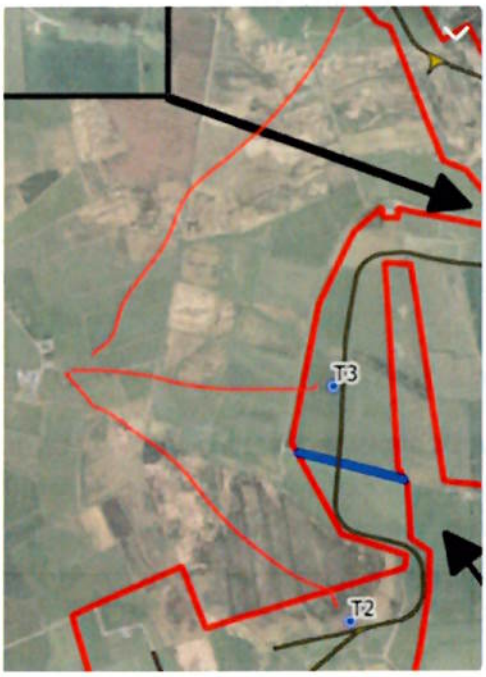
Apart altogether from the threatened mere presence of the proposed Turbines in such close proximity to our house and the very significant impacts on our Visual Amenity flowing from their presence,

specifically T2 and T3 where, from best I can calculate, T3 is proposed to be constructed a mere (approx.) 690 meters from the rear of our home with T2 proposed to be constructed some 975 meters from the rear of our home, some very significant issues arise in respect of **Turbine & Blade shadow** and both **Turbine Blade flicker** and **Turbine & Blade Noise & Infrasound** emanating from each of these Turbine. Similar issues also arise in relation to **Turbine and Blade shadow** and in relation to both **Turbine Blade flicker** and **Noise and Infrasound** in respect of both T6 to the North-East, specifically both shadow and flicker during Summer early mornings and both shadow and flicker from T1 to the South-south-East throughout each and every day of the year.

The so-called flexibility sought and granted to the Developer by ACP leaves us in particular difficulty when seeking to discover how issues of shadow, flicker and noise from these Turbines and their revolving Blades will impact upon our enjoyment of life within our home and garden. Each meter of each Blade flexibility of up to 6 meters (the height of an average home) can and will significantly and adversely impact upon our use and enjoyment of our home and garden and upon our visual amenity in respect of not only our home but also in respect of the surrounding area where we regularly walk.

Issues of Shadow, Flicker Infrasound and Noise from proposed Turbines 1, 2, 3 and 6 will significantly adversely impact us, particularly during mornings and early afternoon throughout the years.

I have shown the position of our home on a screenshot from the Developer's Drawings below from which you will see that our home is situate at a point from where our rear windows will look out at truly enormous Turbines and Blades and we will be obliged to suffer the consequences arising in respect of the very presence of these Turbines and to live with and deal with the significant adverse impacts upon our lives of Turbine shadow and Turbine blade flicker, Turbine and Blade infrasound and noise and significant impact upon our visual amenity.



The variability in Hub Height permitted to the Developer by ACP of anywhere between 99 meters and 105 meters makes everything I have already written above and submitted in relation to Turbine and Blade shadow, flicker and noise almost impossible to comprehend for those of us facing this disastrous proposed Development.

Specific interference with Visual Amenity

The visual impact of the proposed Wind Turbines will significantly obstruct the natural beauty of our surroundings. This area is known for its picturesque landscapes, and the addition of such large turbines so close to our home will fundamentally alter its character and significantly detract from the scenic views.

Specific Interference with quality of life & ability to earn a living

Dependent upon wind direction and wind speeds, time of day and position of the sun in the sky, issues of both **Turbine and Blade noise** may well develop into very significant issues, particularly for me but also in respect of my family, generally, in the event that Permission is granted to the Developer for this proposed Project.

I am a professional performing Musician and Singer and I also both Compose and Arrange music and song. The mere presence of these Wind Turbines so close to our home will have an enormous impact on me.

I have very serious concerns about the noise generated by the proposed wind farm and by the constant flicker and shadow cast by both Turbine Towers and Blades. The proximity of these proposed Turbines to my home raises alarms about the potential for constant noise disturbance that can and will grossly interfere with my daily life and well-being and that of my family. For many, including myself and my family, this can lead to difficulty sleeping and increased stress, thereby greatly affecting the quality of our lives.

I am particularly concerned with and by the issue of **infrasound** emitting from Wind Turbines.

A recent study conducted by Bellut-Staeck, U. (2023) **Impairment of the Endothelium and Disorder of Microcirculation in Humans and Animals Exposed to Infrasound due to Irregular Mechano-Transduction**. ***Journal of Biosciences and Medicines***, **11**, 30-56. doi: 10.4236/jbm.2023.116003

This study was published by academic publisher, **Scientific Research** in the Journal of Biosciences and Medicines > Vol.11 No.6, June 2023

I have reproduced below 2 segments from this Study, the first of which posits a theory that is different from current thinking and the second of which concludes, particularly in relation to Large Wind Turbines that *"there is sufficient evidence to suggest that, as precautionary measurements, further technologies, involving very low frequencies and/or impulsive emissions with potential impact on living organisms,* ***should be limited or better avoided*** *until all issues are scientifically resolved."*

This study concludes that there *"should be reason for urgent precautionary actions and further research."*

3.1. The Difference from Current Thinking

The existing epidemiological studies almost exclusively consider the audio-vestibular organ, respectively the involvement of individual brain structures [49] , as organs, possibly affected by exposure to noise in low-frequency ranges. In comparison with electromagnetic fields, everybody accepts that impacts on organism are not depending on a perception. Why not here? This question has already been asked in 2007 [50] . Many health disorders or manifest clinical symptoms cannot be explained with purely audio-vestibular impact. Since around 2015, the author noticed many complaints worldwide by the residential situation. They are corresponding to functional microcirculatory disorders according to a reduced and uncoordinated *NO-bioavailability*.

These are, e.g., dizziness, school performance disorder, fatigue, tinnitus, muscular weakness and headaches as signs of a disturbed and inadequate support with nutrients and O_2. With chronic exposure, symptoms occur such as increased blood pressure, cardiac arrhythmia, breathing disorders, immune deficiencies, late-onset epilepsy [50] . In a second step a working hypothesis was developed that tested the prerequisites for a direct stressor effect on both, the endothelial cell level and the technical side. The results, available to date from epidemiological studies, experimental and animal experimental studies, were included in the considerations.

In a third step the currently available literature on molecular endothelial physiology and pathophysiology was reviewed with regard to the possibility of mechano-transmission of mechanic forces if outgoing from an extern acting stressor. The identification of PIEZO-1-channels 2021 as important mechano-sensors for sound and vibration strengthened the evidence for our hypothesis. Extensive literature on pathohistological findings in occupational exposure to infrasound from the 1980s [50] , later from the 2000s on exposure of residents to wind turbines [51] and the reassessment of these findings were included.

Due to the audio-acoustic approach, the changed conditions for sound propagation in the viscoelastic organism did not have been considered in the past. We do now. *For the same reason, it makes the so-called perception threshold irrelevant as this only refers to audible sound and air transmission.*

7. Conclusions

For the first time, the symptomatology of chronically infrasound exposed humans and animals can be classified pathophysiologically in a coherent hypothesis. This was made possible by the progress in knowledge of endothelial mechano-transduction, essential as vascular function of vital character in response to mechanical forces. Crucial-cellular processes such as growth, differentiation, migration, angiogenesis, redox homeostasis and inflammation, are simultaneously dependent on mechanical forces and the integrity of the endothelium.

Normally, the flow in the mammalian microcirculation is laminar and not variable. This is achieved by the upstream connection of the resistance vessels in the arterioles. Persistent changes in shear stress patterns, particularly oscillatory flow, have been associated with decreased bioavailability of NO, an increase in reactive oxygen species (ROS), higher lipoprotein oxidation rates, increased endothelial apoptosis, pro-atherogenicity, chronic inflammation and possible development of cancer. We have positive evidence for our hypothesis that a chronically acting oscillating stressor with certain conditions in frequency, time/effect profile, sound pressure and duration might induce an oscillatory stress field and therefore trigger a stress reaction on the cellular level. With the crucial basics of mechano-transduction, there is now a strong evidence with obvious indicators for a possible interaction of infrasound, especially with deep frequencies and impulsive character, as have, e.g., IWT's or heat pumps. The elucidation for the strong dependency on mechano-transduction from the frequency of "Noise" and the identification of actin filaments and microtubules as "low-pass filters", support our hypothesis. In this way, the propagation of sound wave in the viscoelastic organism could become a decodable information. Regeneration, as would occur with a one-time or infrequent exposure, could not take place with chronic impact. Initially functional disturbances of the orchestrated vasomotor system, respectively of sensible *vasomotion*, can be expected, with longer exposure fixed anatomically recognisable pathological damages in endothelial integrity. Important in this context are the structural changes that tend to be self-reinforcing, as described in the example of remodelling of the heart. By probably elucidating the pathophysiological pathway of how infrasound/IFLN could lead to the main health disorders, it will be possible to make steps forward in defining safe distances for living or working with emitting technical installations. Many scientific questions remain to be answered, but there is sufficient evidence to suggest that, as precautionary measurements, further technologies, involving very low frequencies and/or impulsive emissions with potential impact on living organisms, should be limited or better avoided until all issues are scientifically resolved. The possible effects on insects, which have not been clarified yet, could be of great importance, e.g., for the biodiversity and for co-affection of pollinators and thus nutrition.

The decoding of the PIEZO-1-channels should have already alerted public to the potential risks. Inner organs are sensitive for sound and vibration. The current state of knowledge on mechano-transduction together with known oscillatory and oxidative stress effects, point in the direction of our hypothesis and should be reason for urgent precautionary actions and further research.

The human and animal health issues raised by this published Study on **Infrasound Emissions** from **Large Wind Turbines** are quite shocking and in the context of this Application that is currently before ACP, they must surely cause ACP to refuse any Grant of Planning Permission until such time as safe separation distances have been established between peoples' homes and proposed Wind Turbines and between wherever mammals including farm and wild animals, insects and birds are present and proposed Wind Turbines.

Returning to my own personal situation, I have recorded several albums at our house, primarily because it is situate in such a peaceful environment with, hopefully, many more to come in the years

ahead. In the event that Planning Permission is granted for this Development, I fail to see how it will be possible for me to continue with my work and with my artistic endeavours at our house.

Specifically, I am concerned about, composing, rehearsing and/or recording music close by any Large Wind Turbine that can present several challenges, primarily due to the noise generated by the turbine's blades and machinery. Firstly, each Turbines produces a continuous hum or swishing sound that can interfere with the clarity of recorded audio; Secondly, on the specific issue of Vibration and Infrasound, it is a fact that the operation of a Large Wind Turbine may cause vibrations and infrasound that can be picked up both by the human ear and by sensitive recording equipment thereby causing significant degradation of audio quality.

Moreover, I want to highlight again the issue of **Shadow Flicker** caused by the rotation of the Blades of Wind Turbines. This **Shadow Flicker** can be both disruptive and intrusive, particularly during sunrise and sunset, but also, on clear and moonlit nights. This phenomenon poses an unwelcome intrusion into our home and manifests itself as a distraction for us, impacting upon our comfort in our own home and possibly, even our health.

Health issues

Apart from what I have outlined above on issues of **Infrasound, Turbine & Blade shadow** and both **Turbine Blade flicker** and **Turbine Noise** emanating from each of these Turbine one of the most significant impacts arising from Wind Turbines and having to live in close proximity to them arises from the substances that are habitually thrown off from the Blades of these Turbines over the course of their lives. The most significant issue arising is that of BPA of Bisphenol A

Bisphenol A (BPA)

Bisphenol A (BPA) is a chemical produced in large quantities for use primarily in the production of polycarbonate plastics and epoxy resins.

"Bisphenol A is the most toxic substance we know' – according to the Swedish Environmental Protection Agency.

Wind turbine blades are constructed using fiberglass reinforced with epoxy resins, which contain 30-40% ***Bisphenol A.***

According to an article published in the Business and Human Rights Resource Center:

Bisphenol A *and similar substances are among the most troublesome substances that are now finding their way into drinking water, watercourses, and our sea areas in larger and larger quantities. Quite small concentrations of* ***Bisphenol A*** *damages the fertility of humans and all organisms, and despite this fact, the quantity and use of this dangerous chemical increases quite significantly. One of the biggest problem areas is the huge increase in epoxy compounds in the turbine blades in wind turbines.*

Bisphenol A (BPA) can be and is habitually released from Wind Turbine Blades, primarily through the erosion of their composite materials, particularly the epoxy resin that binds the carbon or glass fibres. As the Blades are exposed to environmental factors like wind, rain, and sunlight over time, the protective coatings on the leading edges wear down, **causing the release of microplastic particles** that contain **BPA**. This erosion is accelerated by high rainfall and the high rotational speeds of the blades, with the tip of the blade experiencing the greatest wear due to its high velocity, potentially reaching up to 300 km/h.

1 kg of Bisphenol A makes 10 billion litres of water unusable.

The significant adverse consequences to both human and animal health and to the health of birds, insects and fish of the throwing off of microplastic particles containing BPA from the blades of Wind Turbines are truly horrifying.

Agriculture is significantly adversely impacted by Bisphenol A (BPA) through contamination arising from the casting off of microparticles. This contamination arises when ageing blades degrade or are processed during decommissioning and disposal, allowing BPA to leach into the local soil and water systems. This known endocrine disruptor can then enter the food chain, impacting multiple sectors, including dairy farming, sheep farming, and crops. For crop farmers, there is a risk of chemical uptake directly by the plants from contaminated soil or irrigation water. For livestock farming, the ingestion of contaminated drinking water by herds, whether dairy cows or sheep, raises concerns about **chemical bioaccumulation** in animal products like milk and meat, potentially jeopardizing product safety and the farm's market viability.

I ask An Coimisiún Pleanála to please take the time to investigate the effects of BRA on agriculture and on human health. This is particularly so because of the high numbers of agricultural enterprises in and around this proposed Development Site.

Cumulative Impacts

The supposed Cumulative Impacts of having so many Wind Energy Projects in this part of Galway are as listed and set forth on pages 146 or 147 and following pages of the **Natura Impact Statement (NIS)**, where each other Wind Farm is dealt with separately as opposed to there being information provided on the **CUMULATIVE** impacts of them all when taken and considered together ..... that is, they indicate what the impacts may be (none! they say) of A & B and of A & C and of A & D all the way down through the list of Projects provided and listed but **NO Information** is provided on the impacts of A & B & C & D & E & F & G etc etc, that is to say, on the **cumulative impacts** in the sense of assessing the impacts of them all together, plus taking and assessing them together with the High Voltage Power Transmission Lines that run through the area and further, assessing them together with the Transmission Line from the Proposed Development to the National Grid and all of which must be cumulatively be assessed together with the proposed . This failure to properly set forth the possible cumulative impacts of all of the foregoing or to set them and appraise these at all represents a major lacuna in the information provided and in respect of which neither an Environmental Impact Assessment nor an Appropriate Assessment in accordance with Article 6 of the Habitats Directive and Article 4 of the Birds Directive can possibly be conducted.

Designation of Site for Proposed Development in accordance with

Galway County Development Plan 2022 - 2028

The Developer asserts the following on page 8 of the **Planning Report** for this Wind Farm Development - Document File Name: **190723 – Cooloo Planning Report F**

- Volume 3: Appendices

Natura Impact Statement

The NIS submitted as part of this application includes the following:

- NIS Volume 1 – Main Report (including AASR)
- Appendices

2.5 Summary of Findings

This planning report analyses the planning policy against which the Proposed Development will be assessed. The main findings of the report are outlined as follows:

- The Proposed Development is strongly supported by climate and energy policy and law at a European, national and regional level.
- The Proposed Development is supported by, and is in compliance with, the policy and objectives of the Galway County Development Plan 2022 – 2028 ('GCDP').
- The Proposed Development has been designed in accordance with the Wind Energy Development Guidelines for Planning Authorities (2006) and the Development Management Standards for Renewable Energy Proposals, as set out by the GCDP.
- The rationale behind the designation of the part of the Application Site as 'Generally to be Discouraged' in the Local Authority Renewable Energy Strategy ('LARES') for wind energy development is unclear. The Application Site performs well against the scoring matrix and opportunity/ sensitivity maps that informs the wind energy designations in the LARES.
- The LARES fails to designate a sufficient quantum of land as "Acceptable in Principle" or "Open to Consideration" to achieve the targets specified in the plan, and consequently, County Galway's share of the 9GW of onshore wind required under the Climate Action Plan 2025 ('CAP 25').

The Developer bemoans the fact that part of the Site upon which the Developer has applied for Planning Permission from ACP for 3 x of the 9 x Turbines applied for is designated by the Galway County Development Plan 2022 – 2028 as "***Generally to be discouraged***".

This was a conclusion reached by Galway County Council following upon an Appropriate Assessment conducted by it in accordance with the provisions of the EU Habitats and Birds Directives in June of 2022. In fact, Galway County Council has published an "**APPROPRIATE ASSESSMENT CONCLUSION STATEMENT**" that is available on its Website to all members of the public, including the Developer. While the Developer may bemoan the fact that some of those lands that form part of the site upon which it has sought Development Consent are designated as "***Generally to be discouraged***", the Developer does not appear to have challenged that Designation in any way when the County Development Plan was adopted by Galway County Council in 2022 and subsequently accepted by the relevant Government Minister.

Just like me, the Developer could have challenged the Development Plan by way of Judicial Review in 2022 but the Developer, apparently, chose not to do so and accordingly, the Developer must now accept the designation of part of the Site chosen by it as being land upon which Development, including the construction and erection of Wind Turbines and their subsequent operating for a period of 35 years is "***Generally to be discouraged***".

I reproduce below page 4 from the Appropriate Assessment Conclusion Statement that I believe to be of the utmost importance when considering the Developer's assertion that the rationale behind the designation of part of the proposed Development Site as "***Generally to be discouraged***" for Wind Energy Development is unclear. Nothing could be made clearer.

Topic	Recommendations integrated into the Plan, included in:
	Guidelines 2004, the EPA Guidelines 'Environmental Management in the Extractive Industry: Non Scheduled Minerals 2006 (including any updated/superseding documents) and to DM Standard 21 of this Development Plan; (b) Require development proposals on or in the proximity of quarry sites, to carry out appropriate investigations into the nature and extent of old quarries (where applicable). Such proposals shall also investigate the nature and extent of soil and groundwater contamination and the risks associated with site development works together with appropriate mitigation; (c) Require Development Proposals to assess the potential impact of extraction in areas where geo-morphological interest, groundwater and important aquifers, important archaeological features and Natural Heritage Areas are located; d) Have regard to the Landscape Character Assessment of the County and its recommendations; (e) Ensure that any quarry activity has minimal adverse impact on the road network and that the full cost of road improvements, including during operations and at time of closure, which are necessary to facilitate those industries are borne by the industry itself. (f) Ensure that the extraction of minerals or aggregates does not adversely impact on residential or environmental amenity; (g) Protect all known un-worked deposits from development that might limit their scope for extraction." NHB 1 "Natural Heritage and Biodiversity of Designated Sites, Habitats and Species. Protect and where possible enhance the natural heritage sites designated under EU Legislation and National Legislation (Habitats Directive, Birds Directive, European Communities (Birds and Natural Habitats) Regulations 2011 and Wildlife Acts) and extend to any additions or alterations to sites that may occur during the lifetime of this plan. Protect and, where possible, enhance the plant and animal species and their habitats that have been identified under European legislation (Habitats and Birds Directive) and protected under national Legislation (European Communities (Birds and Natural Habitats) Regulations 2011 (SI 477 of 2011), Wildlife Acts 1976-2010 and the Flora Protection Order (SI 94 of 1999). Support the protection, conservation and enhancement of natural heritage and biodiversity, including the protection of the integrity of European sites, that form part of the Natura 2000 network, the protection of Natural Heritage Areas, proposed Natural Heritage Areas, Ramsar Sites, Nature Reserves, Wild Fowl Sanctuaries (and other designated sites including any future designations) and the promotion of the development of a green/ ecological network. " NHB 2 "European Sites and Appropriate Assessment. To implement Article 6 of the Habitats Directive and to ensure that Appropriate Assessment is carried out in relation to works, plans and projects likely to impact on European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011. All such projects and plans will also be required to comply with statutory Environmental Impact Assessment requirements where relevant; To have regard to 'Appropriate Assessment of Plans and Projects in Ireland – Guidelines for Planning Authorities 2009' or any updated version." NHB 3 Protection of European Sites. No plans, programmes, or projects etc. giving rise to significant cumulative, direct, indirect or secondary impacts on European sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans, programmes, etc. or projects[2]). NHB 4 Ecological Appraisal of Biodiversity. Ensure, where appropriate, the protection and conservation of areas, sites, species and ecological/networks of biodiversity value outside designated sites. Where appropriate require an ecological appraisal, for development not directly connected with or necessary to the management of European Sites, or a proposed European Site and which are likely to have significant effects on that site either individually or cumulatively. NHB 5 Ecological Connectivity and Corridors. Support the protection and enhancement of biodiversity and ecological connectivity in non-designated sites, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, stonewalls, geological and geo-morphological systems, other landscape features and associated wildlife areas where these form part of the ecological network and/or may be considered as ecological corridors in the context of Article 10 of the Habitats Directive. NHB 6 Implementation of Plans and Strategies. Support the implementation of any relevant recommendations contained in the National Heritage Plan 2030, the National Biodiversity Plan, the All Ireland Pollinator Plan and the

	NHB 5 Ecological Connectivity and Corridors. Support the protection and enhancement of biodiversity and ecological connectivity in non-designated sites, including woodlands, trees, hedgerows, semi-natural grasslands, rivers, streams, natural springs, wetlands, stonewalls, geological and geo-morphological systems, other landscape features and associated wildlife areas where these form part of the ecological network and/or may be considered as ecological corridors in the context of Article 10 of the Habitats Directive. NHB 6 Implementation of Plans and Strategies. Support the implementation of any relevant recommendations contained in the National Heritage Plan 2030, the National Biodiversity Plan, the All Ireland Pollinator Plan and the National Peatlands Strategy and any such plans and strategies during the lifetime of this plan. NHB 7 Mitigation Measures. Require mitigating measures in certain cases where it is evident that biodiversity is likely to be affected. These measures may, in association with other specified requirements, include establishment of wildlife areas/corridors/parks, hedgerow, tree planting, wildflower meadows/marshes and other areas. With regard to residential development, in certain cases, these measures may be carried out in conjunction with the provision of open space and/or play areas. NHB 8 Increased Awareness of the County's Biodiversity and Natural Heritage. Facilitate increased awareness of the County's biodiversity and natural heritage through the provision of information to landowners and the community generally, in cooperation with statutory and other partners. NHB 9 Protection of Bats and Bats Habitats. Seek to protect bats and their roosts, their feeding areas, flight paths and commuting routes. Ensure that development proposals in areas which are potentially important for bats, including areas of woodland, linear features such as hedgerows, stonewalls, watercourses and associated riparian vegetation which may provide migratory/foraging uses shall be subject to suitable assessment for potential impacts on bats. This will include an assessment of the cumulative loss of habitat or the impact on bat populations and activity in the area and may include a specific bat survey. Assessments shall be carried out by a suitably qualified professional and where development is likely to result in significant adverse effects on bat populations or activity in the area, development will be prohibited or require mitigation and/or compensatory measures, as appropriate. The impact of lighting on bats and their roosts and the lighting up of objects of cultural heritage must be adequately assessed in relation to new developments and the upgrading of existing lighting systems. NHB 10 Article 6(1) of the Habitats Directive requires that Member States establish the necessary conservation measures for European sites involving, if need be, appropriate management plans specifically designed for the sites or integrated into other development plans. The NPWS's current priority is to identify site specific conservation objectives; management plans may be considered after this is done. Where Integrated Management Plans are being prepared by the NPWS for European sites (or parts thereof), the NPWS shall be engaged with in order to ensure that plans are fully integrated with the Plan and other plans and programmes, with the intention that such plans are practical, achievable and sustainable and have regard to all relevant ecological, cultural, social and economic considerations, including those of local communities.

[2] Except as provided for in Article 6(4) of the Habitats Directive, viz. There must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.

Moreover, there is another document available on the Galway County Council Website that allows members of the public to view and read both the Strategic Environmental Assessment conducted by Galway County Council and the Appropriate Assessment conducted prior to adoption of the GCC Development Plan 2022 – 2028 following assessment and amendment made by the responsible Minister of Government, that is to say, **Peter Burke T.D., Minister of State with responsibility for Local Government and Planning** and dated 28 Day of September 2022

When taken together and quite apart from the designations of Special Areas of Conservation, Special Protection Areas and National Heritage Areas across County Galway and in the general area close by and in the locality of the proposed Development, I ask you to note the presence of a significant number of areas of **Karst Limestone** within the proposed Development Site together with areas of **Raised Bog**, of significant numbers of **Whooper Swans**, all of which can be guaranteed to flee the area to pastures new in the event that Planning Permission is granted, of **swallow holes** and **underground caverns in the Limestone through which flow enormous amounts of Groundwater** and a number of other Habitats and Species the assertion by the Developer that the designation of part of the proposed Development Site as "***Generally to be discouraged***" for Wind Energy Development "***is unclear***" is remarkable. Nothing could be made clearer.

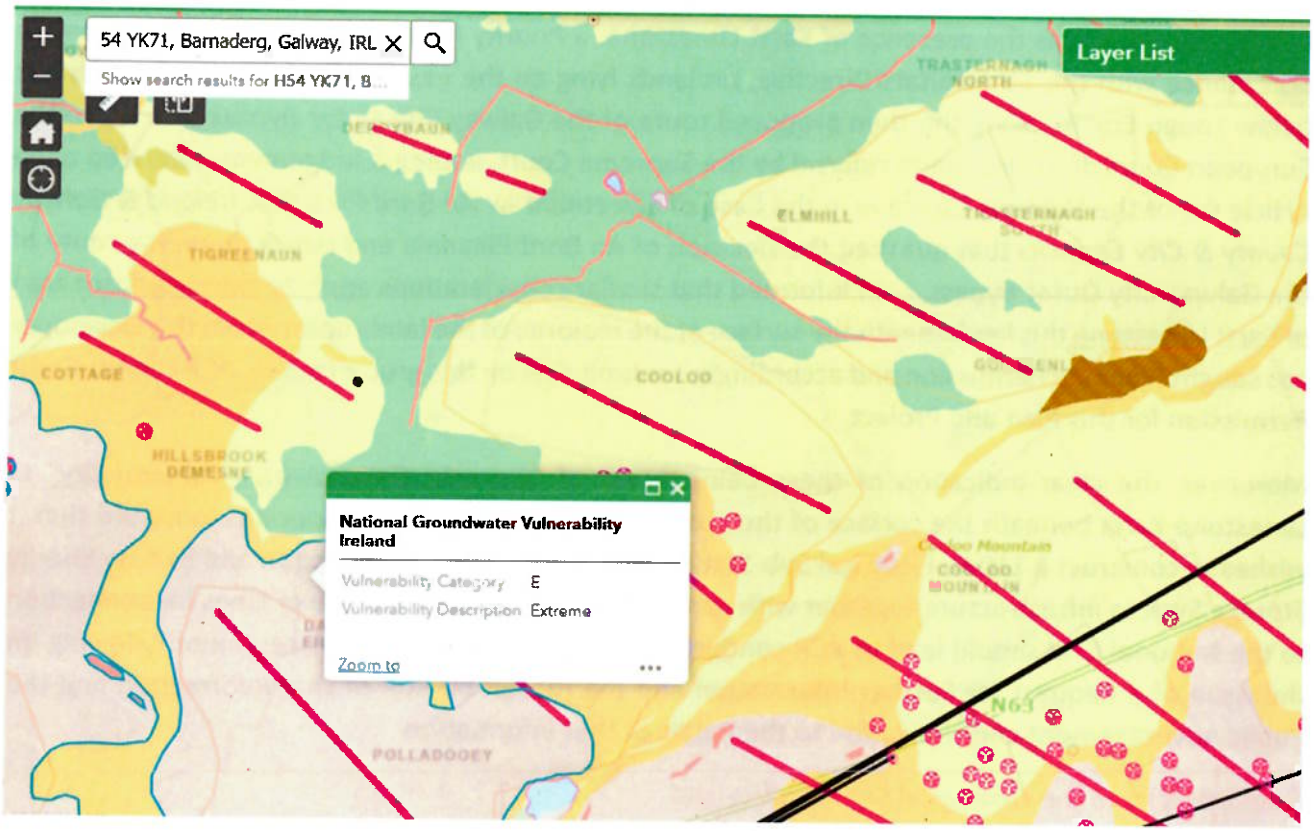
For the record, it was the presence of Karst Limestone, a Priority Natural Habitat pursuant to and in accordance with the EU Habitats Directive, on lands lying on the east bank of the River Corrib just below Lough Corrib, along the then proposed route of the Galway City Outer Bypass that led to the European Court of Justice, upon referral by the Supreme Court, issuing a Judgement grounded upon Article 6.3 of the Habitats Directive in the Case of *Sweetman -v- An Bord Pleanala, Ireland & Galway County & City Councils* that quashed the Decision of An Bord Pleanala and struck down the route of the Galway City Outer Bypass. I am informed that similar considerations apply to the significant area of Karst Limestone this lies beneath the surface of the majority of the lands upon which this Developer has sought Planning Permission and accordingly, I submit that on this ground alone, ACP cannot Grant Permission for this Plan and Project.

Moreover, the clear indication of there being Areas of "*Extreme Groundwater Vulnerability*" in Limestone Karst beneath the surface of the ground upon which the Developer has indicated that it wishes to construct a 110 Kv Electrical Sub-Station together with Grid Connection and Battery Energy Storage System Infrastructure together with construction of High Voltage Power Lines for connection to the National Grid should lead to ACP conducting a vigorous Appropriate Assessment following on the issue of a Request for Further Information and the receipt by ACP of that Information and the Public Advertisement and circulation to the Public of that information

Screenshot from the Geological Survey of Ireland

https://dcenr.maps.arcgis.com/apps/MapSeries/index.html?appid=a30af518e87a4c0ab2fbde2aaac3c228

The black dot on the map below, to the North East of Hillsbrook Demesne is where our home is situate and I ask you to note the "Extreme" vulnerability of the Groundwater in the area immediately to the south is in the Townland of Dangan Eighter where the Developer has indicated its intention to seek permission in the future to construct a 110 Kv Electrical Sub-Station together with Grid Connection and Battery Energy Storage Storage System Infrastructure all of which will, presumably connect to the National Grid by means of High Voltage Power Lines.



I respectfully request that An Coimisiún Pleanála reject this Application and that it direct the Developer to re-advertise and re-submit this Application in accordance with the Preliminary Submission I have made regarding availability of the Natura Impact Statement on the Site specified in the Public Notices.

Moreover, I respectfully submit that ACP must conduct a thorough Appropriate Assessment on the entire Project, including on the 110 Kv Electrical Sub-Station together with Grid Connection and Battery Energy Storage System Infrastructure all of which will, presumably connect to the National Grid by means of High Voltage Power Lines, all of which must be conducted in accordance with both the EU Birds Directive and the EU Habitats Directive, together with an Assessment in accordance with the Water Framework Directive, following which, I am sure that you will refuse Permission for this Plan and Project.

Yours sincerely,

Mike McGoldrick

Hillsbrook

Barnadearg

Tuam

County Galway