

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Paddy Quinn  
Brierfield  
Moylough  
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Galway

To: An Coimisiún Pleanála  
64 Marlborough Street  
Dublin 1  
D01 V902

Date: 09 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 am an 85yr old man and I live with my adult son who has a learning disability. We have lived in Brierfield all our lives. He travels by bus daily to a sheltered workshop run by Ability West one of the few services he has been able to avail of since first being diagnosed as a child. He was one of 6 children. Three of the other five are all living in Brierfield beside me within 1.6km of the proposed windfarms. Nearest to T1.

I worked as a builder and mason, I was in charge of maintenance of the Brierfield water scheme for 30yrs and I am very aware of the importance of the source of the water and the detrimental effects that contamination can cause. I am also concerned about disruption to the water supply during the construction of the proposed development.

I have fished the rivers and the surrounding area since I was a teenage boy and I have already seen the devastation of various rivers and lakes from over ambitious developments that chose to ignore our biodiversity and our natural habitats. I am particularly concerned about the destruction to the Cooloo Bog and the unavoidable consequences of placing a floating road over a living bog as well as felling 0.7 acres of forestry and multiple hedgerows. This together with excavation of 30,000m<sup>3</sup> of peat makes little sense to a man who has lived 85yrs and has witnessed the curtailment of turf cutting in order to preserve boglands as a natural carbon absorber.

Furthermore as mentioned earlier I am concerned for my sons welfare and wellbeing and the impact that

infrasound may have on him as a neurodiverse member of the community. I know that the disruption to roads for over 200 days during construction will for sure cause him considerable distress as he suffers from anxiety and compulsive obsessive disorder.

I am also concerned for the future of my grandchildren and restrictions to any plans they may have to continue living in the Brierfield area.

For this reason and for the reasons described below I strongly urge An Coimisiún Pleanála to refuse this planning Application.

### **Brierfield Group Water Scheme**

I use the water from the Brierfield and District Group 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.

Brierfield and District GWS's Spring at Pollifrin is considered to be part of the same zone of contribution (ZOC) as the Mid Galway PWS and Barnaderg Gortbeg GWS as they all form part of the same groundwater flow system - 'EPA report Establishment of Groundwater Source Protection

Zones - Mid Galway Public Water Supply Scheme (May, 2012)'. However, there is no mention of the Brierfield and District GWS in Chapter 9 section 9.3.15.1 Public/Group Water Schemes.

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 karstified and hydrologically sensitive area.

### **Property Devaluation**

It is fair to surmise that people will not want to live near an industrial wind farm. There is growing evidence of loss of value and depreciation in the marketability of houses which are located near wind farms. The knock-on effect is that people will not move to the area or the local schools, and the community will wither. Rural Ireland still has a strong thriving support network of neighbours and community which will fundamentally be put at risk by imposing an industrial wind farm in the midst of 400 homes.

### **Noise**

Planning permission for the proposed Cooloo Wind Farm should be refused on the basis that it poses a clear and foreseeable risk of substantial interference with the normal use and enjoyment of nearby homes. In *Byrne & Moorhead v ABO Energy* [2025] IEHC 330, the Irish High Court found that wind turbine noise—specifically low-frequency and amplitude-modulated sound—constituted a private nuisance under common law, as it significantly disrupted residents' ordinary domestic life. The Court held that such noise amounted to an unreasonable and continuous intrusion, preventing the quiet occupation of the home and resulting in the permanent shutdown of three turbines in County Wexford.

The Cooloo proposal relies on outdated ETSU-based noise criteria that fail to account for the same low-frequency and modulated noise effects found to cause substantial nuisance in the Wexford case. Given the proposed turbines' greater height and rotor size, the likelihood of these harmful acoustic effects occurring at Cooloo is even higher. Approving this development under obsolete standards would disregard the High Court's findings and expose local residents to predictable and legally recognized interference with their right to the peaceful enjoyment of their homes. Planning permission should therefore be refused in full on these grounds.

## **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**

I object to the proposed development on the grounds of its significant and permanent impact on biodiversity, including legally protected habitats and species.

The project's Environmental Impact Assessment Report (EIAR) acknowledges a residual adverse effect on Degraded Raised Bog (habitat 7120), a habitat of County Importance with capacity for natural regeneration (EIAR Ch. 6, p. 142). Construction of the proposed floating access road between turbines T7 and T9 will directly remove approximately 0.18 ha of this sensitive peatland and disrupt its hydrological balance (EIAR Ch. 6, Sec. 6.5.2.1.1). This is contrary to the conservation obligations set out under the EU Habitats Directive (92/43/EEC).

The site supports cutover bogs (PB4) and Marsh Fritillary (*Euphydryas aurinia*), an Annex II species protected under European law. Breeding webs were recorded near turbine T5 within metres of proposed construction works (EIAR Ch. 6, Sec. 6.4.3.3). The disturbance, dust, and drainage changes associated with turbine and road construction threaten the species' survival locally, directly conflicting with Ireland's duty to maintain favourable conservation status for Annex II species.

The EIAR highlights potential effects on hydrology and connected wetland systems that could degrade otter

(Lutra lutra) habitat and aquatic fauna (EIAR Ch. 6, Sec. 6.5.2.1.1 and 6.2.2). Otters are also protected under Annex II of the Habitats Directive, and any degradation of their habitat represents a breach of Ireland's legal obligations.

These outcomes are inconsistent with the objectives of the National Biodiversity Action Plan 2023–2030, which seeks to prevent net biodiversity loss. Allowing this development to proceed would contradict national policy commitments and international conservation obligations.

Given the acknowledged residual adverse effects on protected habitats and species, I respectfully request that An Coimisiún Pleanála refuse permission for this development. The permanent loss and degradation of biodiversity cannot be justified, particularly where protected species and habitats are involved.

#### References:

- EU Habitats Directive (92/43/EEC)
- National Biodiversity Action Plan 2023–2030
- EIAR Chapter 6 (Biodiversity)
- An Coimisiún Pleanála Case 323761

#### Road disruption during construction

I wish to object to the proposed development on the grounds of significant traffic and road safety impacts during construction, particularly in relation to abnormal load deliveries. The Traffic Management Plan (Appendix 15-2) lacks essential detail, including the number, timing and routing of heavy goods and turbine loads, and commitments to off-peak scheduling. Without clear and enforceable mitigation, there is a risk of damage to narrow rural roads, verges and drainage, along with conflicts between construction vehicles, farm traffic and school transport. No robust plan has been presented for road strengthening, maintenance or reinstatement. The absence of detailed community-specific measures leaves local access, amenity and safety inadequately protected. Until comprehensive information and binding commitments are provided, the proposal represents an unacceptable risk to road infrastructure and rural community wellbeing. Having roads closed for a combined 210 days (at a minimum) is unacceptable. It is also unacceptable for locals to have diversions of up to 13.7km per journey for the duration of this project.

#### Climate impact

I support renewable energy but object to the Cooloo Wind Farm because it will worsen Ireland's land-use emissions. Clearing mature forest and disturbing peat for turbine bases and access roads will release long-stored carbon into the atmosphere. Ireland's Climate Action and Low Carbon Development Act 2021 and the European Climate Law both require that each sector reduce its emissions without offsetting increases elsewhere. This means energy targets cannot legally override land-use targets. If projects like this go ahead without full rewetting and carbon recovery, Ireland risks breaching its climate budgets and facing EU fines. We need clean energy that complements, not competes with, our land-based climate commitments.

#### Battery storage and substation safety risks

I object on the grounds of unacceptable risks to public health, fire safety, and water contamination posed by the proposed substation and Battery Energy Storage System (BESS).

The developer's own Appendix 12-3 Battery Storage Noise Assessment (Sept 2025) identifies fifteen CATL EnerC+ battery containers containing lithium-ion (LiFePO4) systems manufactured by CATL. Predicted operational noise levels reach up to 31 dB LAeq at nearby homes, representing an increase of +11 to +14 dB above background levels. The report itself classifies this as a "significant adverse impact" on residential amenity. Scientific research shows that chronic noise above 30 dB can raise risks of cardiovascular disease and sleep disturbance.

Lithium-ion Battery Energy Storage System (BESS) installations worldwide have experienced fires and explosions that release toxic gases such as hydrogen fluoride and hydrogen cyanide. Research shows that fire-water run-off from lithium-ion battery fires can contain hydrofluoric acid, dissolved metals, and fluorinated organic compounds, which may contaminate nearby soil and waterways if not properly contained.

This proposed Substation and BESS would have a major impact on The Lough Corrib Special Area of Conservation, as a nearby stream eventually flows into Lough Corrib, potentially harming aquatic life and drinking water sources.

Based on the absence of any Fire Safety Management Plan within Appendix 12-3, it appears that nearby fire services are not equipped or trained to respond effectively to large-scale lithium-ion battery fires.

In *Grace & Others v. An Bórd Pleanála* (2017), the Supreme Court ruled that a residence within one kilometer of a proposed development site had standing to argue against consent. This case emphasizes the significance of thoroughly evaluating related infrastructure such as the substation and BESS, which ought to be included in the same consenting procedure as the wind farm itself.

With homes, farmland, and livestock within a few hundred metres of the proposed site, this industrial-scale development poses an unacceptable risk to community health, safety, and environmental integrity. Until independent noise, fire-safety, and hydrological risk audits are completed and verified by competent authorities, I urge An Bord Pleanála to refuse this application in accordance with the Precautionary Principle.

#### References:

- National Fire Protection Association (NFPA) (2020) Hazard Assessment of Lithium-Ion Battery Energy Storage Systems
- TNEI Ireland (2025) Appendix 12-3 Battery Storage Noise Assessment
- World Health Organization (WHO) (2018) Environmental Noise Guidelines for the European Region
- Irish Legal News (2017) Supreme Court: Challenge to wind farm development referred to CJEU

#### 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,

Paddy  
Quinn

Name: Paddy Quinn  
Date: 09 November 2025