Objection to Cooloo Wind Farm Planning Application

An Coimisiún Pleanála – Case reference: PAX07.323761

Name: PAORAIC MITCHELL

Address: CLOONDAHAMPER LAVALLY, GALWAY

Date: 19/11/2025

Re: Cooloo Wind Farm, Co. Galway – Strategic Infrastructure Development Application

Dear Sir / Madam,

I wish to lodge a formal objection to the proposed Cooloo Wind Farm development. My home is located approximately 878 metres from Turbine 7, and my agricultural land and adjoining peatland lie approximately 500 metres from the same turbine. Given this extremely close proximity, the risks and impacts described in the Environmental Impact Assessment Report (EIAR) pose serious and unacceptable threats to my home, health, land, and wider environment.

The EIAR fails to adequately address or mitigate multiple significant concerns arising from the development, including harmful noise exposure, shadow flicker, peat instability, and the dangers associated with floating road construction in deep peat. These concerns are amplified by the site's sensitive hydrology, the known history of catastrophic peat failures associated with wind energy developments in Ireland, and the presence of EU-protected habitats and species. The proposal also risks long-term environmental damage, threats to water quality, interference with agricultural productivity, and infringements on constitutional and human rights. Furthermore, several turbines are sited in areas where wind farms are designated as "generally to be discouraged" under the Galway County Development Plan, demonstrating a clear conflict with statutory planning policy.

For the reasons outlined below, the proposed Cooloo Wind Farm represents an unacceptable and high-risk development that cannot be granted permission.

1. Noise

The noise environment predicted for my home at 878 metres from Turbine 7 must be evaluated against both international health standards and recent Irish case law. The World Health Organization (WHO) 2018 Environmental Noise Guidelines for the European Region recommend a limit of 45 dB Lden for wind turbine noise to prevent adverse health outcomes including sleep disturbance, cardiovascular impacts, annoyance,

and reduced quality of life. The WHO states that noise levels above this threshold create a strong recommendation for mitigation or avoidance.

By contrast, the EIAR for the Cooloo Wind Farm relies on older guidance and permits operational noise levels that approach or exceed WHO recommendations, particularly during certain wind directions, atmospheric conditions, and night-time periods when background noise is low. The EIAR's methodology relies heavily on modelling assumptions that have been repeatedly criticised in Irish High Court judgments, especially the Wexford wind farm cases (Webster and Rollo; Byrne v ABO Energy). In these rulings, the courts found that even where noise levels were technically within guideline limits, the turbines still caused substantial and actionable noise nuisance.

Further concern arises from the EIAR's use of averaged noise data, which fails to capture the amplitude modulation, low-frequency pulsing, and intermittent aerodynamic thumping associated with modern large turbines. WHO guidelines highlight that such characteristics significantly increase perceived loudness and disturbance, even when overall decibel levels appear compliant. The EIAR does not adequately assess these real-world acoustic characteristics nor their impacts on residents.

Given the WHO's clear stance on health-based limits, the Irish High Court's acknowledgment of wind turbine noise nuisance at comparable distances, and the shortcomings in the EIAR's predictive modelling, the risk to my health, sleep, and wellbeing from turbine noise at 878 metres is unacceptably high. WHO guidance, recent Irish case law, and a conservative reading of the acoustic evidence all support refusal of permission.

2. Shadow Flicker

Shadow flicker can cause significant nuisance, including headaches, stress, anxiety, and disruption to household routines. The large scale of the proposed turbines, up to 180 metres tip height, increases the area and intensity of potential flicker impacts.

Under the 2019 Draft Wind Energy Development Guidelines, shadow flicker mitigation is required to be legally binding with zero tolerance for any shadow flicker at any dwelling.

This means:

Mandatory installation of automatic shutdown systems based on real-time light sensors

Full cessation of turbine operation during any period when shadow flicker may occur at a dwelling

Monitoring and enforcement conditions attached to planning permission

No reliance on modelling alone, as modelling often fails to reflect real seasonal and daily variations

Given the uncertainties in prediction and the severe nuisance potential, legally binding zero-tolerance mitigation must be required. If this cannot be fully guaranteed, planning permission should be refused.

3. Peat Stability

Peat excavations, drainage, and road construction pose major risks. Past failures, such as at Meenbog (2020) and Derrybrien (2003), demonstrate how inadequate assessments can lead to catastrophic peat slides. Without rigorous, site-specific geotechnical analysis, the risk of environmental damage remains high.

4. Floating Road Risk

Floating road construction on peat presents a high-risk engineering approach that has repeatedly failed in Irish upland peat environments. The Meenbog disaster (2020) is a critical case study: investigations into the landslide revealed that construction activities, including access road development and drainage works, significantly altered the hydrogeological balance of the hillside, leading to catastrophic failure of deep blanket peat. Despite assurances that construction methods were appropriate, the slope became destabilised due to changes in pore water pressure, load distribution, and drainage patterns, causing a major peat slide that travelled more than 2.5 kilometres downstream and resulted in severe ecological damage.

The Cooloo Wind Farm EIAR proposes construction methods, including potential floating roads, that mirror the same risk profile seen at Meenbog. Floating roads rely on the assumption that peat layers will maintain structural integrity under load, yet the Meenbog investigations demonstrated that this assumption is deeply flawed and scientifically unsound in many peatland settings. Floating roads inherently impose uneven loading, create new preferential flow paths, and disrupt the natural hydrology of boglands. When combined with turbine hardstands, excavations, or drainage cuts, the cumulative effect can lead to progressive slope failure, often with little warning.

The EIAR for Cooloo does not provide sufficiently detailed geotechnical modelling to rule out similar instability. No conservative factor-of-safety calculations are presented for worst-case conditions, such as intense rainfall, groundwater fluctuations, construction loading, or long-term settlement. Without such analysis, the risk profile at Cooloo cannot be considered acceptable.

Given the national significance of the Meenbog peat failure, and the catastrophic consequences arising from inadequate assessment and inappropriate construction methods, floating road construction at the Cooloo site must be deemed an unacceptable and unjustifiable risk unless independent, site-specific geotechnical investigations conclusively demonstrate long-term stability supported by numerical modelling and hydrological assessment.

5. Bats – Protected Under EU Legislation

All bat species in Ireland are listed under Annex IV(a) of the EU Habitats Directive, which requires strict protection. This prohibits deliberate capture, killing, disturbance, or deterioration or destruction of breeding

sites or resting places. The EIAR for the Cooloo Wind Farm identifies the presence or likely presence of several bat species, including Common Pipistrelle, Soprano Pipistrelle, Leisler's Bat, and Daubenton's Bat.

The presence of these species triggers stringent obligations under Article 12 of the Habitats Directive. Where these protected species are recorded or their habitats are present, any risk of collision mortality, barotrauma, disturbance along commuting routes, or loss of foraging habitat constitutes a potential breach of EU law. The EIAR acknowledges activity levels across the site yet provides insufficient evidence that the proposed mitigation will reduce impacts to a level compliant with Article 12. Because derogations are only permissible in exceptional circumstances and with proof of no satisfactory alternative, failure to demonstrate zero risk of disturbance or mortality means that permission cannot be granted.

6. Birds – Protected Under EU Legislation

The EIAR identifies multiple species protected under the EU Birds Directive, including Annex I species such as Hen Harrier, Merlin, Whooper Swan, and Golden Plover, as well as migratory species protected under Article 4. The presence of these species imposes strict obligations on the State to avoid deterioration of habitats, prevent significant disturbance, and ensure no adverse impact on species' conservation status.

Wind energy developments must not result in collision risk, displacement, barrier effects, or disturbance during breeding or migratory periods. However, the EIAR acknowledges that sensitive species utilise or traverse the general area. Several of them, particularly Hen Harrier and Whooper Swan, are known to be vulnerable to turbine collision and disturbance.

The developer must demonstrate no significant risk. The EIAR fails to meet this standard. Therefore, permission must be refused unless independent scientific evidence demonstrates zero significant impact.

7. Wake-Induced Mixing Effects on Farming

Wind turbines modify microclimates by increasing turbulence and disrupting temperature and moisture patterns. These effects can alter soil moisture, grass growth, frost occurrence, and livestock comfort. As my land lies downwind of the proposed development, these impacts pose real risks to farming operations.

8. Right to Property Under the Irish Constitution

Articles 40.3 and 43 protect private property rights. Approving a development that foreseeably interferes with the peaceful use of my home constitutes an unjust attack and risks breaching constitutional protections.

9. Right to Peaceful Enjoyment of Home

Under the Irish Constitution and the European Convention on Human Rights, I am entitled to peaceful enjoyment of my home. The cumulative impact of noise, flicker, visual dominance, and environmental risks will significantly diminish that right.

10. Risk to Water Quality – Including Lough Corrib

The proposed development poses a serious risk to local and regional water quality, including hydrological pathways that ultimately feed into Lough Corrib, designated as both an SAC and an SPA. These designations impose strict obligations on the State to prevent any project likely to cause deterioration of habitats or significant disturbance.

The risk arises from peat excavation, road construction, turbine foundations, borrow pits, and drainage works. Past peat failures demonstrate that peat-laden sediment can travel long distances, causing severe ecological damage. Lough Corrib supports habitats and species of European importance, including salmon, otter, white-clawed crayfish, and sensitive bird species.

Unless complete certainty exists that no water-quality impact can occur, the precautionary principle requires refusal of permission.

11. Conflict with Galway County Development Plan

The proposed Cooloo Wind Farm is inconsistent with the Galway County Development Plan, which identifies areas where wind energy development is generally to be discouraged. At least three proposed turbines fall within such areas.

This designation aims to prevent inappropriate siting near homes, hydrological features, ecological constraints, and sensitive landscapes.

Proceeding with turbines in these restricted areas would undermine the plan-led system and set a negative precedent. The applicant has not demonstrated any overriding reason to depart from the plan.

12. Risk of Maladaptation

The National Adaptation Plan 2025 requires adaptation actions to avoid creating new vulnerabilities. The proposal fails to demonstrate alignment with adaptation objectives such as hydrology protection, peat stability, and flood-risk avoidance.

Disturbing peatland can increase runoff, downstream flooding, carbon emissions, and soil instability. The lack of long-term hydrological planning risks maladaptation.

Conclusion

The proposed Cooloo Wind Farm must be refused. It presents unacceptable risks to residential amenity, human health, peat stability, hydrology, protected species, agricultural land, and the wider environment. It

contravenes the Galway County Development Plan, breaches EU environmental law, and represents an unjustified interference with constitutional property rights and the peaceful enjoyment of my home.

The EIAR fails to demonstrate with sufficient certainty that the project will avoid significant adverse effects. The precautionary principle applies.

Yours faithfully,

Signature: Padraic Mitchell