

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Sinead Kilcourse
Attymon
Athenry
Galway

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

Date: 08 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,

As a member of an adjacent community and the mother of two small children who frequent local sports facilities across Killenerin and Moylough, I am very concerned about this development and the impact both visually and physically it will have across the local landscape.

I am concerned about the cumulative effect of industrial scale wind farms that are proposed across east galway.

I irrevokably urge An Coimisiún Pleanála to refuse planning for this industrial development. I wish to object to this project on the following grounds:

Planning Framework and Guidelines

The continued reliance on the Wind Energy Development Guidelines 2006 is no longer appropriate or proportionate given the significant evolution of wind energy technology and the clear advancements in scientific understanding since their publication nearly two decades ago. The 2006 Guidelines were developed in an era when turbines were typically less than 100 metres in height and generated 1–2 MW of power. The

turbines in this proposed development will be 180 metres and produce approximately 6 MW of power. This will result in greater visual, acoustic, and environmental impacts than those contemplated in 2006.

The fact that the Wind Energy Development Guidelines 2006 has been acknowledged in the Dáil many times by many different people. In 2013 Deputy Michéal Martin told, the then Taoiseach, Enda Kenny that the guidelines were outdated and were never framed in the context of the new technology. Yet in 2025 Tánaiste Simon Harris is still saying in the Dáil that he acknowledges that the guidelines are outdated and that there is a specific commitment from the Government to prioritise the publication of new guidelines.

It is therefore unreasonable and contrary to the principles of proper planning and sustainable development for An Coimisiún Pleanála to continue to rely solely on the 2006 Guidelines. An Coimisiún Pleanála must make sure that any decision made is not based on outdated standards.

Farming

I am deeply concerned about the impact this proposed windfarm will have on the farmers in Barnaderg, Cooloo, and the surrounding areas. Many of these are full-time and part-time dairy and dry-stock farmers, with holdings of varying sizes, and their livelihoods depend directly on the health and productivity of their animals. Farming in this area is not just a way to make a living—it is a way of life, a source of pride and satisfaction. The presence of shadow flicker, excessive noise, and visual intrusion from turbines would seriously disrupt this, affecting both our work and our well-being.

Scientific research underscores this concern. The study - 'Importance of Noise Hygiene in Dairy Cattle Farming – A Review (Dimov, Penev & Marinov, 2023)' highlights that exposure to noise and vibration—even from sources like a milking parlour—can reduce milk yield, lower milk quality, and stress the animals. Turbine noise represents a new, unfamiliar source that could have similar or worse effects on livestock.

Additionally, the developer has not addressed the practical realities of farming life. Farmers rely heavily on the local roads for moving cattle and accessing their land every day. These essential activities could be disrupted by construction traffic, turbine maintenance, or other project-related impacts, further jeopardizing livelihoods. For these reasons, I strongly object to the proposed windfarm.

Reference:

Dimov, D., Penev, T., and Marinov, I. (2023) 'Importance of Noise Hygiene in Dairy Cattle Farming – A Review'. Featured Position and Review Papers in Acoustics Science.

Available at: <https://www.mdpi.com/2624-599X/5/4/59>.

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

Biodiversity Impact - Bats

I object on the grounds that the assessment of bat mortality risk is inadequate and fails to meet current scientific standards for acoustic monitoring and mitigation.

Wind turbines are well-documented sources of bat mortality through collision and barotrauma. Recent peer-reviewed research by Behr et al. (2023, *Mammal Review*, 53: 65–71) confirms that bat fatalities can be reliably estimated only where standardised, referenced acoustic monitoring protocols are applied. The Cooloo Wind Farm EIA does not demonstrate compliance with these standards.

- No evidence of standardised, referenced acoustic monitoring at nacelle level
- Ground-level acoustic surveys and short-term transects are insufficient and cannot predict turbine-specific collision risk
- The proposed tall, large-rotor turbines increase collision risk and monitoring uncertainty
- No commitment to validated curtailment systems (such as ProBat) which have been shown to substantially reduce bat mortality
- Absence of site-specific validation and continuous monitoring means bat fatalities may be severely underestimated

Under the EU Habitats Directive (Articles 12 and 16) and the Wildlife Acts 1976–2018, all Irish bat species are strictly protected. Developers and planning authorities have a legal duty to ensure projects do not result in deliberate killing or disturbance of bats or deterioration of their breeding or resting sites. The absence of scientifically robust, standardised acoustic monitoring represents a significant procedural and ecological shortcoming.

I respectfully request that An Coimisiún Pleanála require:

- Standardised, referenced acoustic monitoring following international best practice
- Nacelle-mounted, calibrated detectors to monitor bat activity continuously throughout operation
- Validated curtailment systems (e.g. ProBat) to automatically shut down turbines during high bat activity
- Independent review and public reporting of all monitoring protocols and data
- Precautionary curtailment during high-risk seasons until adequate local reference data are available

Reference:

- Behr, O., Brinkmann, R., Mages, J., Niermann, I., Korner-Nievergelt, F., & Voigt, C. C. (2023).

Standardised and referenced acoustic monitoring reliably estimates bat fatalities at wind turbines. *Mammal*

Visual Impact

The proposed turbines would be highly intrusive and visually dominant, overwhelming the existing rural character of the local landscape. Their visibility from multiple vantage points would transform a natural and agricultural setting into an industrial-scale development.

The proposal is out of scale with the surrounding environment. The turbines' extreme height and size would cause visual clutter and a loss of scenic amenity, remaining visible even at long distances and creating continuous visual intrusion.

When combined with existing or approved wind farms in the region, this development would lead to visual saturation and skyline dominance, further eroding the landscape's character and reducing its recreational value.

The developer's visual impact assessment understates the visibility and significance of the turbines. Photomontages appear selective and fail to represent the true extent of visual intrusion likely to be experienced by residents and visitors.

The proposal would diminish the rural amenity, tranquillity, and identity of the local region. It threatens the area's sense of place and the quality of life for residents who value the natural and agricultural landscape.

The local wind farm's size and visual impact are excessive and inconsistent with the character of the area. While supporting renewable energy, developments must respect the local landscape — this project does not. The proposal should therefore be refused on the grounds of unacceptable visual and landscape impacts.

Conclusion

For all of the reasons set out in this submission, it is clear that this windfarm would cause more harm than benefit to our area. This community values its peace, safety, and way of life. The proposed windfarm threatens all of these. I ask An Coimisiún Pleanála to listen to the genuine concerns of local people and to reject this development in the interest of protecting our environment, our homes, and our future.

If permission is not refused outright, I request that an oral hearing be held so that I as a local can have my concerns about this development heard.

Yours Sincerely,

A handwritten signature in black ink, consisting of a stylized initial 'S' followed by a long horizontal line that ends in a small loop.

Name: Sinead Kilcourse
Date: 08 November 2025