

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Thomas Healy  
Dangan  
Tuam  
Galway

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

Date: 12 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 live in the townland of Dangan Oughter. I am deeply concerned about the proposed Cooloo wind farm, substation and BESS in Dangan Eighter. I live 2.5km away from T1. Another issue of concern is the water supply for Barnaderg /Gortbeg Group Water Scheme. Should this development proceed I am concerned about pollution and interruptions to the water supply.

Neon by their own admission cannot guarantee that this will not happen. For these reasons and for the reasons outlined below I urge An Coimisiún Pleanála to reject this planning application outright.

## **Community Consultation and Engagement**

The basis that the community consultation process was carried out by Neoen and MKO for the proposed Cooloo Wind Farm has been fundamentally inadequate and does not meet the standards of meaningful public engagement required under the Draft Revised Wind Energy Development Guidelines (2019) or An Bord Pleanála's Strategic Infrastructure Development protocols.

The consultation was poorly publicised, using the Irish Examiner, a Cork-based paper with minimal reach in north-east Galway, for statutory notices instead of the Tuam Herald, the area's primary local newspaper. This choice deprived many residents of awareness and opportunity to participate.

Claims of engagement with “local groups, clubs and schools” are inaccurate. Key organisations such as Killarney Community Council and Killarney GAA received no correspondence or invitations to contribute. Furthermore, no public consultation meeting was held in Moylough, where seven of the nine turbines are proposed, further excluding the most affected residents.

Reported “door-to-door engagement” reached just 55 homes within 1 km of the turbines, yielding only ten written responses which is an unacceptably low level of participation for a project of this scale. Reliance on online materials was ineffective given poor broadband in the area.

Overall, the process was selective, poorly targeted, and misleading in its presentation of local engagement. These failings undermine the project’s compliance with public participation standards and should be given significant weight in An Bord Pleanála’s assessment.

### **Barnadeg Gortbeg Group Water Scheme**

I use the water from Barnadeg Gortbeg Group Water Scheme as my main source of drinking water for my household. The water is of excellent quality and 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. 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 karsified and hydrologically sensitive area.

### **Right to Peaceful Enjoyment of Property**

Article 1, Protocol 1 of the European Convention on Human Rights (ECHR) protects every individual’s right to the peaceful enjoyment of their possessions. It provides that: “Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.”

Granting permission for this wind farm development would seriously interfere with my right to the peaceful enjoyment of my property as a landowner and farmer. My land is not only my livelihood but also my home and heritage, and its value lies in its usability, productivity, and tranquillity. The construction and operation of large-scale wind turbines would bring constant noise, vibration, and shadow flicker, making it extremely difficult to work or live on the land without disruption.

During the lengthy construction period, the constant movement of heavy machinery, road congestion, and elevated noise levels would disturb livestock, damage rural roads, and make normal farm operations significantly harder to carry out. Once operational, the turbines would permanently alter the landscape, impacting both animal welfare and the environment in which I work daily. The cumulative effects of noise, flicker, and visual dominance would deprive me of the peaceful enjoyment and practical use of my land.

Such disruption cannot reasonably be regarded as proportionate or justified in the public interest, and therefore would constitute a breach of the protections guaranteed under Article 1, Protocol 1 of the ECHR.

### **Shadow Flicker**

Chapter 5 of the EIAR (‘Population and Human Health’) states that the nearest residential property is 720 metres away from the closest wind turbine (T8) However there is no mention of a house (Eircode H53 FF64) that is 530 metres away from Turbines 4 and 5 and 600 metres away from Turbine 8. This property is not accounted for at all in the EIAR.

The Wind Energy Guidelines of 2006 advise a setback distance between a wind turbine and a house of 500 metres. These guidelines are almost 20 years old and outdated.

The 2019 Draft Wind Energy Development Guidelines suggest a mandatory minimum setback distance of 500 metres between a wind turbine and the nearest residential property, and 4 times the tip height, whichever

is greater.

Shadow flicker, caused by the rotating blades of wind turbines casting intermittent shadows, can have a significant impact on nearby residents. Prolonged exposure to these flickering shadows can cause visual discomfort, headaches, and even trigger migraines in susceptible individuals. Adequate setback distances and screening measures should be implemented to minimize the potential health effects associated with shadow flicker.

### **Brierfield National School**

Brierfield National School is 1.35 km away from Turbine No 1

The turbines being this close to the school will no doubt have an impact on the education of the children in Brierfield NS. The school will suffer from noise pollution, infrasound and shadow flicker. In addition to this, during the construction phase and while laying cabling the roads to and from the school will be impacted by road closures, traffic, additional noise and dust. Again, all of this will impact on the children of the school.

Brierfield NS also has a special class for children with Autism. These children process noise and light differently to other children. The noise, infrasound and shadow flicker will no doubt impact on their daily lives in school.

I am also concerned that if planning permission is granted less people will be moving to or building in the catchment area of Brierfield NS. This will lead to fewer children in the community and may lead to the school losing teachers, and ultimately the school closure.

### **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>.

### **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.

### **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 (LiFePO<sub>4</sub>) 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,

Thomas

Healy

Name: Thomas Healy

Date: 12 November 2025