

# OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Thomas Mchugh

Sunhill

Derreen

Tuam

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 16 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 wish to formally object to the above planning on the following grounds.

1. Visual Impact, the proposed turbines will dominant the rural landscape and affect the scenic character of the area and views.
2. Negative affects on property value, there is estimated to be at least 13% property devaluation at a time of cost of living crisis.
3. The environmental concerns, it will introduce noise, shadow flicker and disruption to local wildlife and protected habitats.
4. Mental Health and Wellbeing, the exposure to Turbine noise Industrialization of rural landscape will contribute to stress anxiety and reduced quality of life for residents and in particularly for vulnerable residents such as elderly, those with disability and children and adults with neuro-diversity.
5. Water supply, we also have concerns regarding possible pollution and disruption to our water supply in Gortbeg which could have short-term or long-term consequences.

For these reasons and for the reasons outlined below we urge An Coimisiún Pleanála to refuse planning for this development.

## **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 Killenerin Community Council and Killenerin 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.

## **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.

## **Barnaderg Gortbeg Group Water Scheme**

I use the water from Barnaderg 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 Own/Transfer Property**

Article 43.1.2 of Bunreacht na hÉireann provides that "the State accordingly guarantees to pass no law attempting to abolish the right of private ownership or the general right to transfer, bequeath, and inherit

property.” Granting permission for this wind farm development would effectively undermine this constitutional protection. Landowners and farmers within the affected area would face significant restrictions, as land situated near turbines would become unsuitable for residential development. This would prevent families from transferring land for the purpose of building homes for future generations, thereby eroding their practical rights of ownership and inheritance.

Furthermore, Article 43.2.1 acknowledges that the exercise of property rights must be regulated by the principles of social justice. However, this proposed development cannot be regarded as socially just. It disproportionately burdens local residents while providing little to no direct benefit to the community. Those of us living in the area would experience substantial and lasting impacts — including increased traffic and road closures during construction, ongoing noise pollution, shadow flicker, and significant visual intrusion on our landscape. In addition, there remains insufficient scientific evidence to conclusively demonstrate that large-scale wind farms pose no long-term health risks to nearby residents. In these circumstances, permitting this development would be neither fair nor consistent with the principles of social justice recognised under Article 43.

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

Article 1, Protocol 1 of the European Convention on Human Rights (ECHR) safeguards 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.”

Approval of this proposed wind farm would constitute a clear interference with this right. If the development proceeds, I will be deprived of the peaceful enjoyment of my home and property. The construction and operation phases would bring significant and continuous disturbance — including persistent noise pollution, low-frequency noise (LFN), shadow flicker, and heavy vehicle movements. The tranquillity and visual amenity of my surroundings, which form an intrinsic part of my home environment and well-being, would be irreversibly diminished.

During construction, the constant flow of heavy machinery and associated noise would cause ongoing disruption and stress, further impacting daily life. Once operational, the presence of industrial-scale turbines dominating the landscape would permanently alter the character of the area, stripping residents of the quiet enjoyment of their homes and lands. This level of intrusion cannot be considered proportionate or justified in the public interest, and therefore conflicts with the protections afforded under Article 1, Protocol 1 of the ECHR.

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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.

### **Property Devaluation**

A study from the University of Galway and international research indicates that homes within 1 km of wind turbines experience adverse effects on property value, with reductions of up to 14.7%. My home falls within this range, and I am deeply concerned about the financial and emotional impact this will have on my family and our future prospects. The planning application does not appear to address or mitigate this issue.

<https://www.universityofgalway.ie/media/researchsites/ceris/files/WP-2023-01.pdf>

### **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>

### **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. 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. Also the presence of shadow flicker, excessive noise, and visual intrusion from turbines would seriously disrupt this, affecting both our work and our well-being.

### **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

### **Extra construction traffic**

I strongly object to this proposal due to the major disruption and safety risks it poses to our local community during the construction phase. The Traffic Management Plan fails to provide clear information on delivery schedules, routes or mitigation for abnormal turbine loads. Our rural roads are narrow, shared by farm machinery, school buses and local traffic, and cannot safely accommodate such heavy haulage without damage or obstruction. The application states that there will be approximately 14 extra return trips made by trucks carrying materials. This is vastly underestimated for a project of this size. There are no binding

guarantees on road repairs, traffic management or timing of deliveries to avoid peak community use. Residents, farms and schools in Barnaderg, Cooloo and surrounding areas will face delays, dust, noise and restricted access. This plan does not adequately safeguard community safety, local livelihoods or the integrity of rural infrastructure. Permission should not proceed without full, enforceable traffic controls and local protection measures.

### **Climate impact**

I object to the proposed Cooloo Wind Farm because it would damage Ireland's ability to meet its climate targets under the Climate Action and Low Carbon Development Act 2021. By excavating peat and clearing mature forest, this project will release large amounts of stored carbon and increase emissions from the Land Use, Land Use Change and Forestry (LULUCF) sector, which is already a major source of greenhouse gases. Under the law, all public bodies must act consistently with national carbon budgets. Allowing a development that worsens LULUCF emissions contradicts that duty and the EU 'no debit' rule under Regulation (EU) 2018/841. Renewable energy projects are important, but they should not come at the cost of destroying carbon-rich habitats or undermining Ireland's long-term environmental obligations.

### **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.

### **Broadband Impact**

Given the number currently working from home now, strong broadband is a necessity. There are concerns that the signal, and therefore working from home capabilities will be negatively affected by this proposed windfarm. This is due to the fact that the windfarm is situated exactly within line of sight to the mast. It is unacceptable that broadband signal and mobile phone services utilizing this mast will be degraded, and potentially to such a degree that it will be unusable. This may be worsened by the width of the wind turbine needed to support the weight, and the blades which can create periodic drops in signal level and variable amounts of reflection.

### **Project Splitting**

The applicant proposes to seek planning consent for the nine turbines at this stage, while deferring a separate application for the substation, BESS, and grid connection. This approach amounts to project splitting, which is contrary to proper planning practice and should not be permitted.

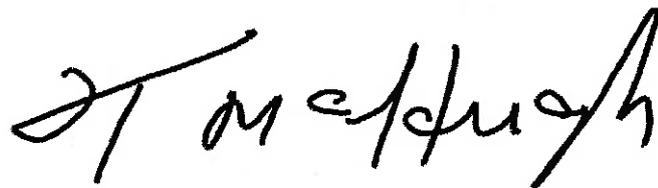
These elements are integral and interdependent components of a single development. They cannot function in isolation, nor can the community have their say on the development unless it is seen as one complete project. The entire scheme must therefore be evaluated as one complete project under a single planning process.

### **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, appearing to read 'Thomas Mchugh'. The signature is written in a cursive, slightly slanted style.

Name: Thomas Mchugh  
Date: 16 November 2025