

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Warren Greaney

Forty Acres

Barnaderg

Tuam

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 13 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 Forty Acres with my parents Peter and Mary and my sister Sarah. I went to the local national school in Barnaderg and I currently work in the family business. Good broadband for working from home is required for this job and is important to me.

In the near future I intend to build a house on lands adjacent to my home. Killererin is a wonderful place to live, it is where my friends that I grew up with are and where most of my family and cousins reside. If the proposed Cooloo Wind Farm is to get planning permission, our futures are doomed to living in an industrial area rather than a quite peaceful rural mainly agricultural area.

I request An Coimisiún Pleanála to refuse planning permission for this development and object on the following issues.

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 Killiererin Community Council and Killiererin 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 application depends upon the 2006 Wind Energy Development Guidelines (WEDG), which are nearly twenty years old. These guidelines were written when onshore turbines rarely exceeded 100 metres in height. The proposed turbines, however, are approximately 180 metres tall, almost double that scale, yet the same 500-metre setback is applied. This outdated standard fails to reflect advances in turbine design, the increased magnitude of visual, noise and shadow impacts, or current scientific understanding of low-frequency sound and health. Comparable European jurisdictions apply height-based setbacks (for example, 10 times turbine height or a minimum of 1–2 km). Proceeding under static 2006 standards is inconsistent with international best practice and contrary to the precautionary principle enshrined in Article 191 of the Treaty on the Functioning of the European Union (TFEU). By relying on obsolete national guidance, the proposal fails to satisfy the Galway County Development Plan 2022–2028 (GCDP) objectives to preserve landscape character and protect residential amenity (Policies LCM 1 and LCM 2).

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 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.

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.

Biodiversity Impact - Earthworms

I object on the grounds that the Environmental Impact Assessment fails to address the impacts of wind turbine-induced vibrational noise on soil biodiversity and ecosystem function, particularly earthworm populations.

Recent peer-reviewed research by Velilla et al. (2021, *Oikos*, 130(7), 1033–1047) demonstrates that wind turbines generate continuous low-frequency vibrations (< 500 Hz) that travel considerable distances through soil. Key findings include:

- Vibrational noise decreased by only 23 ± 7 dB over 200 metres, meaning measurable vibration extends well beyond turbine bases
- Earthworm abundance declined by approximately 40% near turbines compared to sampling points further away
- Soil compaction and crop type were ruled out, confirming vibrational noise was the primary cause
- The impact is body-size-dependent, especially harmful to earthworms and other large soil invertebrates

Earthworms are critical "ecosystem engineers" essential to soil health and agricultural productivity. A 40% decline in their populations can lead to:

- Reduced soil aeration and water infiltration, increasing flooding and erosion risks
- Disruption of nutrient cycling and carbon sequestration, undermining soil fertility and climate regulation
- Deterioration of soil structure and microbial balance, impacting crop performance and long-term land viability

These impacts are especially concerning in productive agricultural soils. The Cooloo site shares

characteristics with the farmland studied by Velilla et al. (2021) — organically managed, rural, and composed of active agricultural soils.

The Environmental Impact Assessment submitted for Cooloo does not address subsurface vibrational noise or its potential to degrade soil ecosystems. This represents a significant omission in the assessment of environmental and agricultural impacts.

I respectfully request that An Coimisiún Pleanála require:

- Comprehensive assessment of soil-borne vibrational noise impacts
- Evaluation of effects on soil macrofauna, especially earthworms
- Protective buffer zones of at least 200–250 metres from turbine bases to high-value agricultural soils
- Vibration-dampening measures in turbine design and foundations
- Soil biodiversity indicators in post-construction monitoring

Reference:

- Velilla, E., Collinson, E., Bellato, L., Berg, M.P., & Halfwerk, W. (2021). Vibrational noise from wind energy turbines negatively impacts earthworm abundance. *Oikos*, 130(7), 1033–1047.
<https://doi.org/10.1111/oik.08166>

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

As a local farmer, I am deeply concerned that the Cooloo Wind Farm will lead to further peat drainage and the felling of productive forest land. This will increase national land-use emissions and make it harder for Ireland's agriculture and forestry sectors to stay within their climate ceilings. Under the Climate Action and Low Carbon Development Act 2021, every sector must remain within its own emission limits. Projects that raise LULUCF emissions add to future pressure on rural landowners, who may face restrictions such as mandatory rewetting or livestock reductions to make up the shortfall. This proposal benefits energy targets but harms the land sector and undermines fair burden-sharing under national climate law.

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.

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,

W. Greaney

Name: Warren Greaney
Date: 13 November 2025