

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

William Jones

Lecarrow

Moylough

Ballinasloe

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, Elmhil, Cooloo, Lecarrow, Dangan Eighter, Lissavally, Slievegorm
- Co. Galway

Applicant: Neoen Renewables Ireland Limited

Dear Sir/Madam,

I was born and reared in Lecarrow. I went to the local national school in Cooloo. I was involved in many community groups growing up including the local GAA clubs and local Soccer Club.

I am married to Laura who is from a neighbouring parish. We have 1 young son. We built our forever home in the last few years and are very concerned about the loss in potential value if the Cooloo Wind Farm is given the go ahead.

I live next door to my elderly parents and are also concerned about the health impacts it will have on them.

These monstrous Turbines will tower above our home and those of our neighbours. We are concerned about the noise impacts and the shadow flicker these will cause.

I strongly request An Coimisiún Pleanála to consider my submission and to refuse planning permission for the development of Cooloo Wind Farm. I wish to object on the following grounds

Community Consultation and Engagement

The basis that the consultation was undertaken by Neoen and MKO for the Cooloo Wind Farm has failed to meet the basic expectations of transparent and inclusive community engagement. It falls short of national guidelines and the intent of An Bord Pleanála's Strategic Infrastructure Development process.

Statutory notices were published in the Irish Examiner instead of the Tuam Herald, which most local households rely on for news.

Despite claims of consultation with local groups, key organisations such as Killarney Community Council and Killarney GAA, were not engaged in any meaningful way.

No public event was held in Moylough, even though seven of nine turbines are proposed there, excluding many directly affected residents.

The developer's report cites "door-to-door engagement" with only 55 homes and ten written responses is evidence of a process that reached few and failed to inform many.

The developer's continued reliance on online materials to provide information disadvantaged rural residents with poor internet access and a large number of older residents without a technical knowledge.

These shortcomings show that the consultation was administrative rather than genuine, and did not provide the community with a fair chance to participate. An Bord Pleanála should recognise these significant deficiencies when assessing the project's compliance with public engagement standards.

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.

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.

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>

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.

Shadow Flicker

The EIAR's treatment of shadow flicker fails to meet statutory and international standards for the assessment and mitigation of human health and residential amenity impacts. It relies on outdated guidelines, applies over-simplified modelling assumptions, and does not provide adequate protection to the large number of dwellings and receptors affected.

The EIAR confirms that:

- 218 residential receptors are located within 1.62 km of proposed turbines,
- 171 of these are predicted to experience shadow flicker, and
- 43 receptors are within 1 km of a turbine.

These figures demonstrate that the project is situated in a densely inhabited rural area, yet the assessment dismisses the significance of impact based solely on a theoretical model rather than verified site conditions.

By any reasonable measure, 171 dwellings affected by a rotating shadow intrusion constitutes a major residential amenity and public health concern, not a negligible effect.

The EIAR applies the 2006 DoEHLG Wind Energy Development Guidelines, which allow up to 30 minutes per day or 30 hours per year of shadow flicker at any dwelling.

However:

- The 2019 Draft Wind Energy Development Guidelines (and reiterated in the 2025 Climate Action Plan Annex) require that no occupied dwelling or sensitive receptor experiences any shadow flicker through the use of automatic turbine control systems.
- The EIAR itself acknowledges that turbine software could achieve this standard but chooses to assess impacts under the obsolete 2006 thresholds.

This approach is contrary to current best practice and fails to future-proof the development in line with national policy on renewable energy development and community protection. Although the EIAR cites various international studies (some over a decade old) claiming no proven medical link between shadow flicker and disease, it fails to address contemporary health guidance:

- The World Health Organisation (2018) recognises annoyance and sleep disturbance as legitimate health effects of environmental light and noise intrusions.
- The HSE's own scoping response (2023) requested an assessment of all likely significant impacts on sensitive receptors, including shadow flicker, along with proposed mitigation.
- The EIAR's discussion focuses on whether shadow flicker can cause seizures (which is rare), but ignores chronic stress, fatigue, and loss of amenity due to regular flicker events within residential interiors.

The result is a narrow and outdated view of human health inconsistent with EPA (2022) guidance, which defines health as "a state of complete physical, mental and social well-being."

The shadow flicker assessment in the Cooloo Wind Farm EIAR is deficient, outdated, and incomplete. It underestimates the true scale of residential intrusion and fails to apply the precautionary principle required under both EU and Irish environmental law.

Given:

- 171 dwellings predicted to experience flicker
- Outdated 2006 guideline thresholds
- Absence of enforceable mitigation and cumulative analysis

this development cannot be deemed to have no likely significant effect on human health or amenity.

National Schools

The presence of wind turbines near schools can have a range of impacts on students, staff, and the overall learning environment. Wind turbines produce both audible noise and low-frequency infrasound, which can be noticeable inside buildings, which can cause a distraction. This constant distraction will interfere with children's attention and overall cognitive performance, making it more difficult for students to focus on learning.

- Cooloo NS is 1.59km away from the nearest wind turbine.
- Brierfield NS is 1.35 km away from the nearest wind turbine.
- Barnaderg NS is located approximately 3.49 km from the nearest wind turbine.

Shadow flicker caused by rotating turbine blades can create intermittent light in classrooms, which can be distracting and, in some cases, uncomfortable or stressful for children. The noise and shadow flicker will also greatly impact on the children in the school who have an additional need. There is a lack of research to state the impact on these children.

In addition to the above, during the construction phase and while laying the cabling, the roads will experience increased traffic and road closures. This will impact children travelling to and from school. While the severity of these impacts depends on distance from the turbines, it is clear that wind turbines in close proximity to schools have the potential to disrupt learning, reduce student wellbeing, and interfere with the overall educational experience.

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

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.

Major accidents and natural disasters

I object on the grounds that Chapter 16 of the Cooloo Wind Farm EIAR fails to provide a robust assessment of major accident and natural disaster risks.

The report's references to peat instability and raised-bog cutover are inadequate given the known susceptibility of peat landscapes to movement and sediment release during heavy rainfall or storm surge events. The EIAR's reliance on generic statements about low geological risk neglects the amplified high-wind, flood and peat-fire hazards forecast for County Galway under the local authority climate plan.

The lack of detailed modelling of flood-pathways or worst-case scenario storm events undermines the precautionary principle embedded in Irish planning law. This is a serious deficiency given the scale of the proposed development and the sensitivity of the peat landscape.

No explicit contingency or evacuation measures are detailed for the community along the grid-route corridor — a serious omission when tall turbines and infrastructure could present hazard in extreme events.

The assessment is incomplete and fails to satisfy the legislative requirements of an EIAR insofar as it must identify, describe and assess direct and indirect effects of the development on the environment and human beings.

I call on An Coimisiún Pleanála to require an independent supplementary risk assessment, specific to peat-hazard, flood-modelling and major-accident scenarios, before any decision is made on this application.

References:

- Galway County Council (2024) Local Authority Climate Action Plan 2024-2029
- Environmental Protection Agency (EPA) (2022) Guidelines on the Information to be Contained in Environmental Impact Assessment Reports (EIAR)
- European Commission (2024) Environmental Impact Assessment: Overview of EU Rules

Bird collision risk

I object to the proposed development on the grounds that the Collision Risk Assessment (Appendix 7-6, MKO 2025) is methodologically and scientifically inadequate to protect legally protected bird species.

The assessment relies on the theoretical Band Model, which assumes fixed avoidance rates and static behaviour, without validation using telemetry or local field data. Survey coverage is temporally and spatially limited, missing key migration and nocturnal flight periods. This approach fails to capture the real-world behaviour of birds in the area.

The use of a 99.5% avoidance rate for Whooper Swans, without local validation, significantly underestimates the risk of collision. Evidence from Irish Wetlands Bird Survey (I-WeBS) and BirdWatch Ireland indicates that Whooper Swans routinely commute between Horseleap Lough and surrounding feeding areas at low altitudes that overlap turbine rotor heights. The conclusion of 'negligible risk' is therefore unsupported and unreliable.

The report fails to consider cumulative impacts with other regional wind farms or infrastructure, contrary to EU Directive 2009/147/EC (Birds Directive) and Article 6(3) of the Habitats Directive. This is a serious omission given the presence of multiple wind energy developments in the region.

Mitigation measures are undefined and untested. Key figures such as flightline maps (e.g., Figure 7-6-1) are omitted, hindering independent review and transparency. Without clear, evidence-based mitigation strategies, there is no guarantee that collision risks can be managed effectively.

Under the Birds Directive (2009/147/EC) and the Habitats Directive, Ireland has a legal obligation to protect migratory and resident bird populations. The assessment as presented does not provide sufficient evidence that these obligations can be met.

I respectfully request that the planning authority reject or defer this application pending an independent, peer-reviewed reassessment. This should include:

- Full telemetry and radar data for local bird populations
- Expanded seasonal coverage including migration and nocturnal periods
- Transparent disclosure of all field survey data and model assumptions
- Cumulative impact assessment with regional wind farms
- Defined, evidence-based mitigation strategies

References:

- MKO (2025). Appendix 7-6 Collision Risk Assessment, Cooloo Wind Farm EIA
- Band, W., Madders, M. & Whitfield, D. (2007). Developing field and analytical methods to assess avian collision risk at wind farms
- Scottish Natural Heritage (2018). Avoidance Rates for the Onshore Wind Farm Collision Risk Model
- NatureScot (2021). Research Report 909: Using a collision risk model to assess bird collision risks onshore wind farms
- Rees, E. (2006). Whooper Swans: Biology and Conservation. T & AD Poyser
- Crowe, O. et al. (2019). Migration and Roosting of Whooper Swans. Irish Birds 43
- BirdWatch Ireland (2024). Whooper Swan Species Profile & Irish Wetlands Bird Survey (I-WeBS)
- European Commission (2021). Wind Energy and Natura 2000

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

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,

William Jones

Name: William Jones

Date: 16 November 2025