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To

An Coimisiun Pleanala

64 Marlborough Street

Dublin 1

D01 V902

Case Number; PAX07.323699

Re. Submission on proposed Shancloon Windfarm Development – Development in the townlands of Beagh, Beaghmore, Cloonbar, Cloonweelaun, Cloonaglasha, Cloonteen, Corillaun, Derrymore, Shancloon, Toberroe and Tonacoolen, county Galway

Dear Sir/Madam

I wish to lodge a formal objection to the above named proposed wind farm development currently before the ACP. While I recognise the importance of renewable energy and support Ireland's wider transition to sustainable power generation, this particular project raises significant environmental, social, and planning concerns that, in my view, outweigh its stated benefits. The proposal, as submitted, fails to demonstrate that it can be delivered without causing disproportionate and irreversible impacts on the local landscape, community, and ecological integrity of the area.

The scale and siting of the turbines represent a fundamental alteration of the existing rural character. The landscape in question is of high visual and cultural

value, and the introduction of industrial-scale structures in a domestic setting would create prominent visual intrusion over a wide area. The applicant's landscape and visual impact assessments appear to understate both the extent of the zone of visual influence and the likely cumulative effects when considered alongside existing and permitted wind energy developments. This raises serious questions about the adequacy and accuracy of the EIAR provided.

Additionally, the proposal poses considerable risks to local biodiversity. The site and its surrounding habitats support a range of protected species, including birds and bats that are particularly sensitive to turbine-related collision and displacement effects. The ecological surveys submitted do not adequately reflect seasonal variations in species activity, nor do they convincingly demonstrate that the project will avoid significant negative impacts, as required under both national policy and the EU Habitats and Birds Directives.

#### Marsh Harriers

There is a breeding pair of Marsh Harriers in the location of the proposed Windfarm development.

Marsh harriers (*Circus aeruginosus*) have only recently re-established breeding in Ireland and remain extremely vulnerable due to their small population size and reliance on undisturbed wetland habitat. Their typical flight height overlaps with turbine rotor-sweep, placing them at high collision risk. The EIAR with the application does not demonstrate adequate year-round monitoring, especially during the breeding, fledging, and post-breeding dispersal periods. Without robust data confirming that marsh harriers do not use the proposed development site as part of their foraging range, it is impossible to conclude that the proposed wind farm will not significantly impact this recovering species. In line with the precautionary principle, permission should not be granted in the absence of clear evidence of no adverse effect.

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The marsh harrier (*Circus aeruginosus*) is listed as a species of conservation concern in Ireland and benefits from protection under the EU Birds Directive (2009/147/EC). Following its recolonisation in recent decades, the national population remains extremely limited and highly sensitive to disturbance, habitat loss, and turbine collision risk. NPWS guidance notes that raptors with low population numbers and predictable flight behaviour within the rotor-sweep zone require rigorous, seasonally comprehensive survey effort before any risk assessment can be considered reliable.

The vantage-point surveys referenced in the application demonstrate several methodological shortcomings:

- **Insufficient temporal coverage**, particularly during the critical breeding, chick-rearing, and post-fledging periods when marsh harrier flight activity is highest.

- **No clear evidence** that surveys captured flight lines across the full rotor-sweep envelope or within the species' known multi-kilometre foraging range.
- **Lack of longitudinal data**, which is required to detect interannual variation in wetland raptor use of a landscape.

Given the species' known vulnerability to turbine collisions and the recognised importance of wetlands within the region, the application fails to demonstrate compliance with the requirements of Articles 4(1) and 4(2) of the Birds Directive, as well as the safeguards set out in national wind energy planning guidance. In the absence of a scientifically robust assessment, it cannot be concluded that the development will avoid significant adverse effects on marsh harriers.

I would like to draw your attention to the refusal of late by Cork County Council to the extension of The Taurbeg Wind Farm in Cork. The local authority refused permission, saying that an extension had "the potential to result in the continued loss of a significant area of habitat within the SPA(Special Protection Area) which could otherwise be available and suitable to support" the hen harrier. – **Irish Independent Friday 3<sup>rd</sup> October 2025**  
[Cork County Council refuses wind farm extension over hen harrier habitat fears | Irish Independent](#)

#### **Other Sensitive Raptor Species**

In addition to marsh harriers, the wider area supports several other raptor species of conservation interest, including hen harrier (*Circus cyaneus*), red kite (*Milvus milvus*), and kestrel (*Falco tinnunculus*). Each of these species exhibits flight behaviour that places them at varying degrees of risk from turbine infrastructure. The application does not demonstrate that vantage-point surveys, carcass searches, or habitat-use analyses have been conducted at the level recommended by NPWS for high-sensitivity raptor landscapes. The failure to assess cumulative risk — particularly if other wind energy developments are operational or permitted nearby — undermines the robustness of the environmental impact assessment and does not meet the standard required under national and EU environmental law.

#### **Impact on Turloughs and Hydrology in the Area**

Turloughs are a uniquely Irish karst phenomenon, functioning as seasonally flooding wetlands directly connected to underlying limestone aquifers. Because they depend on delicate groundwater dynamics, any alteration to surface water flows, infiltration patterns, or subsurface drainage can cause significant and potentially irreversible ecological harm. Turloughs are listed as a priority habitat under Annex I of the EU Habitats Directive, reflecting their extreme sensitivity and the international importance of the species and communities they support.

The proposed wind farm presents multiple hydrological risks to the many turlough systems in the local areas. Turbine foundations, access roads and cable trenches all require extensive ground disturbance, excavation, and compaction. In a karst environment, these activities can:

- **Alter natural recharge pathways** by diverting or concentrating surface water away from areas that normally infiltrate into the groundwater system feeding turloughs.
- **Increase runoff rates** due to the creation of impermeable surfaces and compacted soils, resulting in abnormal or flash-flooding behaviour within turlough basins.
- **Change groundwater levels** through excavation that intersects subsurface conduits, potentially modifying the timing, duration, or extent of turlough flooding cycles.
- **Introduce pollutants** from concrete washout, hydrocarbons, silt mobilisation, and suspended solids, which can travel rapidly and unpredictably through karst conduits and emerge in turloughs or springs at considerable distances from the development.

The hydrological assessment submitted with the application does not demonstrate a sufficient understanding of the site's karst hydrogeology. The documentation appears to rely on limited walkover surveys, shallow soil investigations, and desktop mapping rather than a full **hydrogeological risk assessment** incorporating dye-tracing, groundwater modelling, or continuous water-level monitoring. Without such data, it is not possible to identify all groundwater pathways or to determine the degree of hydraulic connectivity between the development footprint and nearby turloughs or groundwater-dependent terrestrial ecosystems.

There are a large number of Turloughs within 4km of the proposed windfarm and a lake, some of these are not included or considered in the EIAR with regards to potential risk, Belclare Turlough, Beaghmore Turlough, Hacket Turlough and Castlegrove lake are all omitted from the EIAR when it comes to turloughs at potential risk.

Karst regions are characterised by unpredictable and highly sensitive hydrogeological behaviour. Even minor alterations in drainage patterns can result in:

- Premature drying of turloughs
- Extended or delayed flooding cycles
- Degradation of specialist flora and fauna dependent on seasonal inundation
- Impacts on local wells, springs, and private water supplies

Given the priority status of turloughs and the clear requirement under EU and Irish law to avoid adverse hydrological effects on groundwater-dependent habitats, the applicant has not provided the level of scientific certainty required to demonstrate that the development will not harm these protected features. In the absence of robust hydrogeological evidence and detailed mitigation supported by modelling, the precautionary principle must apply.

### **Community Engagement and Public Consultation Concerns**

Effective and transparent community engagement is a core requirement of responsible wind energy development. However, the approach taken by the

developer RWE in this case has not met the standard expected for a project of such scale and potential local impact. Numerous people in the area have expressed concerns about the limited and inaccessible nature of the consultation process conducted by RWE.

Firstly, many households report that outreach efforts consisted primarily of brief daytime calls to our homes during standard working hours, when a large proportion of residents were understandably absent. As a result, a significant number of affected individuals did not have a realistic opportunity to engage directly with the developer or ask questions about the proposal.

In addition, leaflet drops were reportedly carried out by a contracted third-party distribution company, which provided no opportunity for meaningful two-way dialogue. Information delivered in this manner, while technically meeting a minimal communication threshold, does not constitute genuine engagement and does little to support informed community participation.

The public consultation sessions that were held **by appointment only** and conducted **behind closed doors**, rather than in an open, accessible, drop-in format. This approach limited transparency and failed to create an environment where our community members could benefit from hearing one another's questions, concerns, and perspectives. Best-practice guidelines for renewable energy consultation emphasise openness, inclusivity, and the building of trust—conditions that I feel were not met.

Given the scale of the proposed development and the long-term implications for us the local people, a more robust, inclusive, and transparent consultation process should have been undertaken. Meaningful community engagement is not merely a procedural formality; it is central to ensuring that all affected parties have an equitable opportunity to understand the project, express their views, and contribute to the planning process.

I would ask you to consider the lack of community engagement by RWE and their failings in their obligation to hold meaningful discussions and share factual information with us locals when you are deciding on this application.

### **Economic Impact – Property Values**

One of the most serious and tangible economic risks posed by the proposed wind farm is the potential *depreciation in residential property values* in the surrounding area. This is not merely a subjective concern but one supported by recent, rigorous Irish research.

### **Evidence from Irish Research: NUIG / CERIS Study**

In 2023, the Centre for Economic Research on Inclusivity and Sustainability (CERIS), University of Galway, published a working paper titled "*Wind Turbines and House Prices Along the West of Ireland: A Hedonic Pricing Approach*". [University of Galway](#)

The authors, Gillespie and McHale, used a unique dataset combining satellite-imaged turbine locations with housing data from Daft.ie across seven counties on Ireland's west and southern coasts. [University of Galway](#)

Their analysis revealed:

- A **statistically significant reduction of approximately 14.7%** in property values for homes located within **1 km** of a turbine. [University of Galway+1](#)
- The negative effect on property value was *stronger* for taller turbines, a greater number of turbines, and in areas with more "urban influence." [University of Galway](#)
- Importantly, the authors found that this price-depressing effect **decays over time**, becoming statistically insignificant after about **10 years** of turbine operation. [University of Galway](#)
- While the model did not show a statistically significant depreciation effect beyond 1 km in their dataset, the authors caution that effects *may persist* beyond that distance even if not captured in their analysis. [University of Galway](#)

### **Implications for Local Homeowners**

Given these findings, several key implications arise for the properties in the vicinity of the proposed wind farm:

1. **Material Financial Risk:** Homeowners within ~1 km of turbines are exposed to a real and quantifiable economic risk of losing a substantial portion of their property value (potentially up to ~15%). This is not a hypothetical concern — the CERIS study provides empirical evidence for this scenario in an Irish context.
2. **Mortgage and Equity Impacts:** A depreciation of this magnitude could affect homeowners' equity, mortgage refinancing options, and future resale prospects, especially in the first decade of turbine operation when the effect is strongest.
3. **Insufficient Mitigation:** While community benefit payments or compensation schemes may be proposed, these measures are unlikely to fully offset a 10–15% devaluation for most homes, particularly when structured as one-off payments.
4. **Planning Fairness and Social Equity:** The risk of property devaluation raises equity issues — those living nearest to the turbines (often in rural, less affluent areas) may bear a disproportionate share of the economic burden, while the broader financial benefits of the wind farm accrue elsewhere.

### **Request for Planning Authority Action**

In light of this risk, it is reasonable and indeed necessary for ACP to demand:

- A **detailed financial impact assessment** from the developer, estimating potential property value losses based on comparable Irish data and considering different buffer zones (0-1 km, 1-2 km, etc.).
- The establishment of a **compensation mechanism** for affected homeowners. This could include guaranteed buy-back or market-value protection for properties demonstrably within the most impacted zone.
- Consideration of **alternative project designs**, including adjusting turbine locations or reducing turbine height, specifically to mitigate negative effects on nearby residential properties.
- Ongoing **monitoring and reassessment**: If the turbines are built, there should be a periodic review (e.g., at 3, 5, and 10 years) of actual property market impacts, with provisions to revisit compensation or mitigation if value declines are borne out in practice.

**Conclusion:** The NUIG / CERIS study provides credible, locally relevant evidence that residential property values can suffer significantly due to proximity to turbines. This economic risk must be addressed directly and robustly in the planning process. Without meaningful mitigation, the proposed development could impose a real financial burden on nearby homeowners, undermining the project's social acceptability and fairness.

### **Community Spirit, Rural Identity, and the Right to Protect Our Homeplace**

The community surrounding the proposed wind farm site in the parishes of Caherlistrane and Kilconly in rural County Galway is defined by more than its landscape; it is shaped by long-standing neighbourly ties, shared traditions, and a deep-rooted connection to place. This is not simply a geographic area but a living, intergenerational community whose identity is inseparable from its quiet rural character. The peace, safety, and cohesion of this setting form part of the very fabric of our daily life.

We recognise fully the need for renewable energy and the national transition to cleaner power. However, supporting renewable energy does not mean that every location is appropriate for industrial-scale development. We the people who live here have a legitimate right—both moral and democratic—to voice our concerns about the transformation of our own landscape. Some may label such concerns as “not in my backyard,” but this phrasing fundamentally misunderstands the issue.

**It *is* our backyard. It is our homeplace, our heritage, our children's future. And it is not for sale.**

The rural tranquillity of this area is not an incidental amenity; it is the foundation on which community life is built. A development of this scale 185 meter high towering turbines, heavy construction works, permanent alteration of our skyline risks eroding the very qualities that make our communities viable and cohesive. Rural areas are not empty spaces awaiting industrialisation, they are lived-in landscapes whose value lies in their character, quietness, and sense of belonging.

Our communities are entitled to defend these qualities. Irish planning policy recognises the importance of residential amenity, rural character, and local identity. These are not trivial matters. They are legitimate and material planning considerations. Wanting to protect one's homeplace from disproportionate change is not obstructionism—it is a normal, reasonable response from people who care deeply about where they live.

The strength of community spirit here is evident in the shared concerns, the cooperation between neighbours, and the collective effort to ensure that the future of this landscape is determined fairly. This unity should not be dismissed but respected. A development that undermines community cohesion, threatens rural amenity, and disrupts the peaceful character of the area cannot be said to serve the best interests of the people who live closest to it.

I respectfully ask that An Coimisiún Pleanála prioritises the people who live here and refuses this development, preserving our homes, community, and the unique character of our countryside, protecting our wildlife, watercourses, turloughs, and lakes, and safeguarding the future of those who live here and the next generation. Do not let our generation be remembered as the one that sacrificed rural life.

Kind Regards  
Ruairi Connelly  
Station rd, Castlegrove, Tuam, Galway