

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Katie Ann Stone

Hillsbrook

Barnaderg

Galway

To: An Coimisiún Pleanála

64 Marlborough Street

Dublin 1

D01 V902

Date: 20 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 am a resident of Hillsbrook, Barnaderg, where I live with my husband and our children. We live near his family farm and I am deeply concerned about how this development of nine industrial wind turbines of a height above 180 metres and rotor diameter up to 162 meters will produce continuous low frequency noise (LFN), visual movement and shadow flicker. My house will be approx 1km from turbine 1 and turbine 3. The site for the proposed substation and BESS will be approx 250m from my home.

We chose to live in Hillsbrook as it is close to my husband's family and where he grew up. We were lucky enough to be able to build on their family land and are surrounded by family. This is what country living is meant to be like. For the children being outdoors in the clean air, enjoying the countryside and peace is a core part of their daily life. If this development goes ahead our future will look very different than we had ever imagined. My children will not get to grow up in the beauty of the area, but rather they will grow up shadowed by metal towers and tormented by noise and LFN. When they grow up they will not be able to live in Hillsbrook or build on family land because it is all located too close to the development. Our country living dream will be destroyed, as will our day to day enjoyment of the area we chose to call home.

I believe that renewable energy is absolutely necessary and is very important. But the bad outweighs the good in this development. The proximity to homes, the impact of locals, the impact of nature, the impact on animals and the fact that the carbon emitted during construction will far outweigh the carbon reduced by this development shows that it is not a well thought out project.

Below are just some of the reasons I believe that this development should be outright refused planning permission by An Coimisiún Pleanála:

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>

We built our forever home in 2020 and moved in in 2021. We took out a mortgage to cover the cost. This house has now already been devalued as a result of this proposed development and stands to be further devalued if this development is given the go ahead. Yet our debt remains the same. We are expected to pay in full for a house that is not worth anywhere near what we put in. We will also have no choice in the future to sell the property, we will forever be burdened by this debt as a result of this development.

Article 43.2.1 of Bunreacht na hÉireann 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 will disproportionately burden those of us living near the turbines while providing little to no direct benefit to us or the community. The prospect of a community fund does not stand to benefit the community. As a home owner close to the development I have been told that I will be given money yearly from the development. I don't want money, I want to enjoy the area where I chose to live. I want my rights from the constitution to be kept, and I don't think this is a massive demand.

Those of us living in the area would experience substantial and lasting impacts — including increased traffic and road closures during construction, ongoing noise pollution, LFN, shadow flicker, and significant visual intrusion on our landscape.

Visual Impact:

The proposed turbines would be visually dominant and out of scale with the rural landscape, fundamentally altering its natural and agricultural character. Their extreme height and wide visibility would create continuous visual intrusion, causing significant scenic and amenity loss, even from long distances. In combination with other existing or approved wind farms, the development would contribute to visual saturation and overwhelming skyline dominance, further diminishing the region's recreational and landscape value.

When building our home we had to ensure that every aspect of our build was in keeping with what was already in place in the area. Yet this developer sets out to change the look of our community forever. How is this considered right and just?

The developer's visual impact assessment is considered inadequate, with selective photomontages that underrepresent the true extent of visibility and landscape effects. The project threatens the area's tranquillity, rural identity, and sense of place, undermining the quality of life for residents who value the current landscape.

While renewable energy is supported, developments must be appropriately scaled and respectful of local character. Given the excessive size and impact of this proposal, it is unsuitable for the area and should be refused due to its unacceptable visual and landscape impacts.

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.

As a family our land is situated near the turbines and it would become unsuitable for residential development. This would prevent anyone from transferring land for the purpose of building homes for future generations, thereby eroding their practical rights of ownership and inheritance. It would mean that my family would not be able to use our land in a way that we choose, inhibiting our right to transfer our own land.

Right to Peaceful Enjoyment of Own Property: (Homeowner)

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, my family and 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.

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.

Community Engagement:

The consultation led by Neoen and MKO for the Cooloo Wind Farm was deeply flawed and misleading. It does not meet the standards of genuine public engagement expected by An Bord Pleanála.

There was only a single public consultation meeting which was held outside Moylough, even though seven of nine turbines are proposed there. The plans have also changed significantly since this original meeting. At this meeting I spoke with representatives who failed to explain how the road works in Dangan would not impact me in my daily life. When I questioned the representative about how the new road crossing at Dangan would impact my daily commute I was told that there would be a banksman on the road, but if there were construction vehicles at the crossing I would have to wait. This is completely unacceptable given that this is a public road and used by many locals everyday.

They had also left my house out of a number of their maps. When I told them this they said it was because our house was new. Whether it is a new build or not it shows that they did not do their due diligence with regard to homes in the area. They couldn't answer many more of my questions of concern and have not

since tried to answer these questions.

This was not meaningful consultation but a box-ticking exercise which did not provide the community with a fair chance to participate. These failures must carry serious weight in An Coimisiún Pleanála's consideration of the application.

Local Schools:

Barnaderg National School is located approximately 2.49 km from Turbine No 1.

Brierfield National School is 1.35 km away from Turbine No 1

The turbines being this close to these local schools will no doubt have an impact on the education of the children in Barnaderg NS and Brierfield NS. The schools 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.

I am also concerned that if planning permission is granted less people will be moving to or building in the catchment areas of Barnaderg NS and Brierfield NS. This will lead to fewer children in the community and may lead to the school losing teachers, and ultimately the school closure. Barnaderg NS is where my children will go to school, but if this has to close or loses teachers then this will not be an ideal educational experience for them. In addition to this I work in Brierfield NS and if the school loses children then we will risk losing staff, meaning I will have to go further to work. Yet another lifelong impact of this development.

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. This is where my experience and expertise lies. I can tell first hand experiences of how it is clear that the extra noise and light disruptions will impact on the education of these children. Another impact that has not been addressed by the developers is the additional traffic caused by construction and road closures. Many of these children do not do well with disrupted routines. This could ruin their day for a number of weeks, yet again impacting on their education. Surely it is the role of An Coimisiún Pleanála to protect these children who are at greatest risk within our 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>

Biodiversity:

I fear that this development will have a significant and permanent impact on biodiversity. 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).

The site also 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.

References

- An Coimisiún Pleanála -. (2022). 323761. [online] Available at: <https://www.pleanala.ie/en-ie/case/323761> [Accessed 29 Oct. 2025].

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.

I am very concerned about the potential substation and BESS, especially as it will be located so close to my own home, and considering all of the questions raised regarding safety in another locally planned wind farm in Clonberne. It is clear that without the substation, BESS and grid connection this project will not be as fruitful, and will not hold as great of benefits as the developer claims. And yet they have left this out of planning. Not having this included seems like a way of tricking An Coimisiún Pleanála and trying to fool the community into thinking they are getting one thing when it will likely end up as a much larger, and more dangerous development.

The substation and BESS pose a lot of health and safety risks and I urge An Coimisiún Pleanála to consider the impact of this whole development on locals and their safety.

Outdated and Inadequate Planning Framework

Relying on the Wind Energy Development Guidelines 2006 is no longer appropriate. Since their publication, wind energy technology has advanced significantly, and scientific understanding has deepened. The 2006 Guidelines were based on turbines under 100 metres and 1–2MW in capacity, whereas the proposed turbines will be 180 metres tall and produce around 6MW, causing greater impacts.

The outdated nature of these guidelines has been acknowledged in the Dáil multiple times. In 2013, Deputy Micheál Martin noted that the guidelines did not reflect modern technology, and in 2025, Tánaiste Simon Harris confirmed that the Government prioritizes the creation of new guidelines.

Therefore, it is inappropriate for An Coimisiún Pleanála to base decisions solely on the 2006 Guidelines. Decisions must reflect current technology and environmental standards. All new Wind Farm developments should be paused until updated guidelines are established so that affected communities are not unfairly treated by these outdated guidelines

Conclusion:

In light of the serious concerns outlined above I 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 us local residents, farmers, and the wider community.

This proposal has divided our community and in time, if this development is allowed to go ahead, it will destroy relationships within the community and no doubt have an impact on the population of the community. I have no doubt that if this development is allowed to go ahead it will result in nuisance actions being brought, and ultimately a permanent injunction to shut down the windfarm. The people of our community will not sit back and allow our lives to be ruined by a development that is not for the greater good.

I therefore strongly object to this proposal and I feel that given all of the facts An Coimisiún Pleanála has no choice but to refuse the planning permission. If this development cannot be rejected outright I urge An Coimisiún Pleanála to hold an oral hearing so that this matter may be given proper thought and discussion.

Yours Sincerely,

Katie Ann Stone.

Name: Katie Ann Stone
Date: 20 November 2025