

OBSERVATION/SUBMISSION TO PLANNING APPLICATION

Case Reference: 323761

Michael Stone
Hillsbrook
Barnaderg
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 object to the Cooloo Wind Farm development and all its associated works. The wind turbines are too big, there are too many and they are too close to houses.

I am a young person who is hoping to take over the family farm. These wind turbines will be an eye sore, destroying good quality agricultural land. The noise and flicker is going to affect me and my neighbours. The wildlife are also going to be affected with the swans and ducks that fly over where the wind turbines have been destroyed.

I intend to build a house in the near future on our land and these big tall wind turbines are going to affect me with the flicker and the noise.

I request An Coimisiún Pleanála to consider my submission and refuse planning permission for this development. I also wish to object on the following issues

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.

Property Devaluation

The 2023 CERIS (Centre for Economic Research on Inclusivity and Sustainability) paper – ‘Wind Turbines and House Prices Along the West of Ireland: A Hedonic Pricing Approach’ – surveyed the prices of houses located near windfarms in seven counties.

The paper states that: ‘The analysis finds a robust and significant reduction in property value of -14.7% within 1km of a turbine’ and that ‘Back-of-the-envelope calculations suggest that the total loss in value for houses within 1km of a turbine in the case counties is approximately €6.8 million.’

Galway County Council is an agent for the state of the Republic of Ireland and as such is responsible to uphold Article 40 of the Irish Constitution which states – ‘the state shall in particular by its laws protect as best it may from unjust attack and in the case of injustice done vindicate the life, person, good name, and property rights of every citizen.’

I am aware that the Barnaderg Cooloo Wind Farm Action Collective have spoken to a local auctioneer, who said that he had trouble selling a house in County Mayo because it was close to several wind turbines. The auctioneer was able to site a specific instance whereby a married couple looked at the house and decided not to buy it. The auctioneer said that the presence of the wind turbines was a crucial factor in the couple's decision not to buy the house. The owners of this house ended up selling for less money than the couple had been initially willing to pay for the house.

Noise

The proposed Cooloo Wind Farm should be refused planning permission, citing the Irish High Court case *Byrne & Moorhead v ABO Energy* [2025] IEHC 330, in which wind turbine noise was legally recognized as a private nuisance, leading to the permanent shutdown of turbines in County Wexford. The objection highlights that the Cooloo proposal fails to address proven low-frequency and amplitude-modulated noise impacts similar to those measured in the Wexford case, where sound levels far exceeded safe limits and caused serious disturbance to residents living over a kilometre away. The Cooloo project's reliance on outdated ETSU-style noise standards, which disregard low-frequency and tonal effects, is therefore deemed inadequate to protect public health and residential amenity.

The proposed turbines at Cooloo—significantly larger than those involved in the Wexford case—are likely to generate even stronger low-frequency noise that travels farther and fluctuates more intensely under local atmospheric conditions. This increases the risk of nuisance and potential legal liability for both developers and planning authorities. Ireland's 2006 wind energy guidelines are outdated and fail to reflect modern scientific understanding of turbine acoustics. Until revised national standards are adopted, approving large-scale wind farms under obsolete criteria would be unsafe and contrary to the public interest. Planning permission should therefore be refused due to the clear and foreseeable risk of harm to residential amenities, the inadequacy of current noise controls, and the legal precedent confirming wind turbine noise as a substantial nuisance.

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.

Farming

There are dairy and dry-stock farmers in Barnaderg, Cooloo and the surrounding areas, both full-time and part-time. Holdings vary in size. Many of these farmers depend on their livestock performing well in order to pay their bills. Also, those who are farming in the area enjoy the work they do, in the absence of shadow

flicker, noise or visual pollution. If this development is granted their livelihoods will be impacted.

The 'Importance of Noise Hygiene in Dairy Cattle Farming – A Review' (Published November 1st of 2023 by Dimo Dimov, Toncho Penev and Ivaylo Marinov) details how vibration and noise from a milking parlour can negatively impact the milk yield and milk quality of a dairy cow. The paper also discusses how exposing animals to noise from an unfamiliar source can cause them stress.

It is also important to note that the developer has not taken into account the ways in which farmers depend on the local roads for moving cattle and for access to their land when going about their daily tasks within their farms.

Reference:

Dimov, D., Penev, T., and Marinov, I. (2023) 'Importance of Noise Hygiene in Dairy Cattle Farming – A Review'. Featured Position and Review Papers in Acoustics Science.

Available at: <https://www.mdpi.com/2624-599X/5/4/59>.

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

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.

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

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.

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,

Michael
Stone

Name: Michael Stone

Date: 16 November 2025