

Response to Report by Galway County Council

Cooloo Wind Farm (ACP
Ref. 323761)

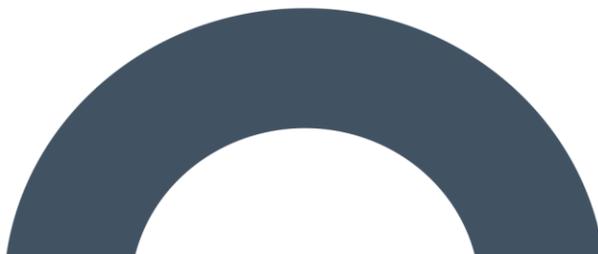


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1. INTRODUCTION

MKO has prepared a response, on behalf of Neoen Renewables Ireland Ltd. (the Applicant), to the report received from Galway County Council (GCC), as requested by An Coimisiún Pleanála (the Commission, ACP) on 13th January 2026 in relation to the Strategic Infrastructure Development (SID) planning application before them for consideration (ACP Ref: 323761).

The Commission's correspondence was accompanied by a copy of a report received by the Commission (the GCC Report) from Galway County Council dated 3rd October 2025, which outlines the Planning Authority's views and recommendations for the Commission to consider when making their decision on the Cooloo Wind Farm planning application. The Commission's correspondence requested the Applicant to make submission or observation to the Commission on the Submission by the 10th February 2026. MKO requested an extension to respond to the GCC Report by email dated 5th February 2026. An extension was granted by the Commission via email on 6th February 2026, until 24th February 2026.

This response document sets out the Applicant's responses to the Submission, with the structure following a similar format as the GCC Report.

1.1 Overview of the Proposed Project

The Applicant lodged a planning application to the Commission in September 2025 for the Proposed Project as set out in the public notices as follows.

"The proposed development will consist of the provision of the following:

- i. 9 no. wind turbines with the following parameters:

 - > Total turbine tip height of 180 metres;
 - > A rotor blade diameter of 150 to 162 metres;
 - > A hub height of 99 to 105 metres;*
- ii. Permanent turbine foundations, hard-standing and assembly areas;*
- iii. Underground electrical (33kV) and communications cabling;*
- iv. 1 no. temporary construction compound (including site offices and welfare facilities);*
- v. A meteorological mast with a height of 100 metres, security fencing and associated foundation and hard-standing area;*
- vi. 1 no. new site entrance on the R332 in the townland Lisavally;*
- vii. 1 no. new access and egress point off the L6056 Local Road in the townland of Dangan Eighter;*
- viii. 1 no. new access and egress point on to an existing access track in the townland of Dangan Eighter;*
- ix. 2 no. new access and egress points off the L6301 Local Road in the townland of Cooloo and Lecarrow;*
- x. Upgrade of existing site tracks/roads and provision of new site access roads, clear span crossings, junctions and hard-standing areas;*
- xi. A new temporary access road from N63 national road and to R332 Regional Road in the townland of Slievegorm to facilitate the delivery of turbine components and other abnormal sized loads;*
- xii. Demolition of an existing derelict house and adjacent outbuilding in the townland of Cooloo;*
- xiii. Peat and Spoil Management Areas;*
- xiv. Tree felling and hedgerow removal;*
- xv. Biodiversity Management and Enhancement measures;*
- xvi. Site Drainage;*

- xvii. *Operational Stage site signage; and*
- xviii. *All ancillary apparatus and site development works above and below ground, including soft and hard landscaping.*

A 10-year planning permission and 35-year operational life of the wind farm from the date of commissioning of the entire wind farm is sought (other than temporary and permanent works specified above).”

1.2 Terminology

The terminology of project elements used within this report, remains consistent with the terminology used throughout the original planning application documents including the EIAR and is outlined below.

- ‘Proposed Project’: Encompasses the entirety of the project for the purposes of this EIA in accordance with the EIA Directive. The Proposed Project is described in detail in Chapter 4 of the EIAR.
- ‘Proposed Wind Farm’: This refers to turbines and associated foundations and hard-standing areas, meteorological mast, access roads, temporary construction compound, underground cabling, peat and spoil management, site drainage, biodiversity enhancement, turbine delivery route (TDR) accommodation works and all ancillary works and apparatus. The Proposed Wind Farm is described in detail in Chapter 4 of the EIAR.
- ‘Proposed Grid Connection’: Refers to the 110kV onsite substation, battery energy storage system and 110kV underground cabling connecting to the existing Cloon 110kV substation, and all ancillary works and apparatus. The Proposed Grid Connection is described in detail in Chapter 4 of the EIAR. The Proposed Grid Connection does not form part of this planning application.
- ‘Site’: Relates to the primary study area for the EIAR, as delineated by the EIAR Site Boundary in green as shown on Figure 1-1 of the EIAR and encompasses an area of approx. 355 hectares.
- ‘Proposed Wind Farm site’: This refers to the portion of the Site surrounding the Proposed Wind Farm but excluding the portion of the Site surrounding the Proposed Grid Connection underground cabling route.

2. REPORT BY GALWAY COUNTY COUNCIL

Galway County Council prepared a Report to Elected Members in accordance with Section 37E (4) of the Act on the Proposed Project. The purpose of this report is to set out the views of the Planning Authority on the effects of the Proposed Project on the environment and the proper planning and sustainable development of the area.

Several items are discussed within the report by GCC and are addressed in the sections below under the following topics:

- > Planning Policy
- > Relevant Planning History
- > Enforcement Information Relating to the Subject Site
- > Environmental Impact Assessment (EIAR)
- > Water Framework Directive
- > Planning Considerations
- > Recommended Conditions
- > Tuam & Ballinasloe Municipal Districts

The following sections outline the main topics raised within the GCC Report, and the Applicant's response to each topic, where relevant.

2.1 Planning Policy

GCC note that the Proposed Wind Farm is principally located in areas where development is either identified as a 'Open to Consideration' or 'Generally to be discouraged' as set out by the Local Authority Renewable Energy Strategy (LARES). With regard to the relevant policy objectives in the County Development Plan (CDP) and the LARES, GCC conclude that the principle of Proposed Wind Farm is considered to be acceptable, subject to the assessment of the proper planning and sustainable development.

Response

The Applicant welcomes GCC's assessment that the principle of development of the Proposed Wind Farm is acceptable, subject to the assessment of the proper planning and sustainable development. The wind energy zoning and principle of development are discussed in detail in the Planning Report which accompanied the planning application.

2.2 Relevant Planning History

GCC note that there are no significant or relevant planning applications on the application site and acknowledge the planning application for the meteorological mast (Pl. Ref: 23/119). No further relevant planning applications have been made in the vicinity of the application site since the lodgement of the application.

GCC also acknowledge the other wind farm planning applications within 25km of the Proposed Wind Farm, which are listed in Appendix 2-3 of the EIAR. The status of these wind farm applications remains the same as described by GCC in their report.

2.4 Enforcement Information Relating to the Subject Site

GCC notes that there are no enforcement cases relating to the subject site identified on the Internal Planning Viewer.

2.5 Environmental Impact Assessment (EIAR)

GCC note the Proposed Project falls within the definition of a project under the EIA Directive 2011/92/EU as amended by EIA Directive 2014/52/EU and falls within the scope of Class 3 (i) under Part 2 Schedule 5 of the Planning and Development Regulations, 2001 (as amended), and also exceeds the output threshold and the turbine threshold, and therefore is subject to a mandatory EIAR.

GCC also note ACP is the competent authority with regard to assessing the EIAR and should, therefore, ensure that the submitted EIAR is sufficient to make a determination in accordance with Directive 2014/52/EU. Where ACP are minded to grant permission, they should be satisfied that the proposed development would not have a significant effect on the receiving environment.

Response

As detailed in Section 1.2 of Chapter 1 in the submitted Environmental Impact Assessment Report (EIAR), the EIAR complies with the EIA Directive 2011/92/EU as amended by Directive 2014/52/EU. In addition, Article 94 of the Planning and Development Regulations 2001 (as amended) sets out the information to be contained in an EIAR, with which the EIAR complies. The Environmental Impact Assessment (EIA) will be undertaken by ACP, as the competent authority.

The EIAR provides information on the receiving environment and assesses the likely significant effects of the Proposed Project on it and proposes mitigation measures to avoid or reduce these effects. The function of the EIAR is to provide information to allow ACP to conduct the EIA of the Proposed Project.

All elements of the Proposed Project, i.e. the Proposed Wind Farm and Proposed Grid Connection have been assessed as part of the EIAR.

2.6 Designated Sites

GCC notes the provision of a Screening for Appropriate Assessment Report and Natura Impact Statement as part of the application.

2.7 Water Framework Directive

GCC note that Chapter 9 Appendix 9-4 of the EIAR contains compliance assessment with the Water Framework Directive and that ACP is the competent authority with regard to assessing the Water Framework Directive and should therefore ensure that the submitted application documentation is sufficient to make a determination. Where ACP are minded to grant permission, they should be satisfied that the proposed development would not have a significant effect on the receiving water bodies.

Response

A Water Framework Directive (WFD) Compliance Assessment has been completed for all waterbodies (surface water and groundwater bodies) with the potential to be impacted by the Proposed Project.

With the implementation of the mitigation measures detailed in Chapter 9 of the EIAR there will be no change in the WFD status of the underlying groundwater body or downstream surface waterbodies as a result of the Proposed Project. The Proposed Project has been found to be fully compliant with the WFD and will not prevent any waterbody from achieving its WFD objectives.

2.8 Planning Considerations

2.8.1 Strategic Assessment and Principle of Development

GCC welcomes investment in the county through the facilitation of onshore wind energy development. They note the importance of balancing the infrastructure demands of such projects with proper planning and the sustainable development of the local area. Having regard to the NPF Project Ireland 2040, Climate Action Plan 2024, the Northern and Western Region RSES 2020–2032, and the GCDP 2022–2028, GCC considers the Proposed Project acceptable in principle, subject to all other material planning considerations outlined below.

2.8.2 EIAR Considerations

GCC notes the inclusion of the following subject areas that are considered within the EIAR:

- Community Benefit Fund
- Landscape and Visual Amenity
- Heritage and Archaeology
- Traffic and Transport
- Climate and Environment
- Ecology and Biodiversity
- Human Health and Residential Amenity

The Applicant welcomes GCC's observations in relation to the EIAR. The Applicant wishes to make the following responses in relation to GCC's observations on Traffic and Transport and Climate and Environment.

2.8.2.1 Traffic and Transport

GCC Roads Department have made comments with regard to traffic and transport impacts having regard to Relevant Standards:

- TII Publications DN-GEO-03060 Geometric Design of Junctions (priority junctions, direct accesses, roundabouts, grade separated and compact grade separated junctions), May 2023, Section 5.6.2.2 Direct Access, tables 5.4 and 5.5.
- TII Publications DN-GEO-03031 Rural Road Link Design, May 2023-Section 2 Sight Distance, Figure 2.1, passing bays Figure 9.3.
- TII publications - PE-PDV-02045
- TII standards DN-GEO-03030
- TII Road Safety Audit guidelines GE-STY-01024
- Galway County Development Plan 2022-2028
 - DM Standard 28, Distances Required for Access onto National, Regional, Local and Private Roads
 - DM standard 33a: Sight Traffic and Transport Assessment (TTA), Road Safety Audit (RSA) & Road Safety Impact Assessments (RSIA)
- Galway County Development Plan 2022-2028 Transportation Policy Objectives
 - NNR2 - Safeguard the Capacity and Safety of County's Regional & Local Roads

The following concerns raised by GCC Roads Department:

- i. *In the absence of a recommended Road Safety Audit Stage 1/2 to reflect the entire scheme including new vehicular accesses onto the public road network and significant scale of roadside interventions being proposed in accordance with TII Road Safety Audit guidelines GE-STY-01024.*
- ii. *The required Visibility splays in relation to compliance to forward and stopping sight distance triangles where the Regional R332 road speed limit resides whilst owing to the sub optimum horizontal and vertical alignment & profile of the public road as denoted by continuous white line at midpoint of road and where the subject site proposes to introduce new site entrance/access onto regional route network is considered to be restricted. The vertical envelope of visibility (i.e. intervisibility) has not being demonstrated in accordance with TII standards, in particular the provisions of visibility requirements as stated within DN-GEO-03031 Rural Road Link Design, May 2023- Section 2 Sight Distance, Figure 2.1 would render the road network, or any part of it, unsuitable to carry the additional road traffic including additional generated turning movements likely to result from the proposed development. It is considered that if permitted as proposed that the development would endanger public safety by reason of traffic hazard, obstruction of road users or otherwise, contrary to policy objectives NNR2, and DM Standards 28, and DM standard 33a of the Galway County Development Plan 2022-2028.*
- iii. *Whilst having regard to the safety and the impact to the public road in accordance to DM Standard 33a of the Galway County Development Plan 2022-2028, where the uncertainty of regional and local road network arises regarding the carrying capacity of alternative traffic diversions to support such extensive road closures, in conjunction with the necessity of scoping and seeking third party consent of proposed grid connection underground works where impacting the public road circa 18.0km of works from Subject site to Cloon Substation as proposed & whereby considered outside the control of the applicant. It is considered that the proposed works are at variance to Policy Objectives NNR 2 in relation to safeguarding regional and local roads of the Galway County Development Plan 2022-2028. Therefore, in relation to safeguarding the transport function of public roads and associated public road junctions, it is considered that the proposed development works would interfere with the safety and endanger public safety by reason of traffic hazard or obstruction of road users or otherwise and therefore would be contrary to the proper planning and sustainable development of the area*

Based on the concerns raised above, GCC noted that in the event of conditional grant permission, it is considered as a minimum that the traffic and transport conditions included in their submission should be attached on behalf of the Roads Authority. These recommended conditions are addressed below in Section 2.7 of this response document.

Response

Road Safety Audit

As part of the preparation of the EIAR, a scoping document providing details of the Proposed Project, and setting out the scope of work for the EIAR was prepared by MKO and circulated in April 2023, with updated project details circulated in July 2025. Consultees were invited to contribute to the EIAR by suggesting baseline data, survey techniques and potential impacts that should be considered as part of the assessment process and in the preparation of the EIAR.

Transport Infrastructure Ireland (TII) responded to Scoping on the 24th of May 2023 and again on the 6th of August 2025, in which it provided a list of recommendations to be followed when preparing the EIAR. All relevant TII guidelines and policies have been taken into account in the preparation of the traffic and transport assessment included in Chapter 15 of the EIAR, including the following;

- PE-PDV-02045, Traffic and Transport Assessment Guidelines, Transport Infrastructure Ireland, May 2014
- PE-PAG-02017, Project Appraisal Guidelines, Unit 5.3, Travel Demand Projections, Transport Infrastructure Ireland, October 2021
- DN-GEO-03060, Geometric Design of junctions, Transport Infrastructure Ireland, May 2023.

Copies of the scoping replies from TII are included in Appendix 2-1 of the EIAR.

As described in Chapter 15 Section 15.1.1.4 of the EIAR, a Road Safety Audit or a Design Phase Procedure for Road Safety Improvement Scheme, Urban Renewal Schemes and Local Improvements Schemes (DN-GEO-03030) Report was not undertaken at the proposed temporary track at the N63/R332 junction or the proposed construction phase site entrance off the R332, however, the Applicant commits to undertake and provide these should they be required by TII and as recommended in the conditions outlined in Section 2.8 of this response document.

R332 Construction Phase Site Entrance

The R332 construction phase site entrance will be subject to traffic management measures for the duration of the construction phase and is not intended for use during the operational phase except in the unlikely event of an abnormally sized load being delivered for maintenance purposes. The proposed construction site entrance for the Proposed Project was subject to Autotrack assessment to identify the turning area required and to ensure the safe egress of traffic in accordance with TII DN-GEO-03060, as described in Section 15.1.10 of Chapter 15 of the EIAR.

It is noted that the required visibility splays for an 80 kph speed limit, 160m along the nearside carriageway edge taken from a setback of 3.0m, are available along the R332 construction phase site entrance to the west and east and the full forward 160m forward visibility for traffic approaching from the east to observe a vehicle waiting to turn right into the Proposed Wind Farm site is partially constrained by existing shrubs and bushes. As a result, a detailed Traffic Management Plan (TMP) incorporating all the mitigation measures is included as Appendix 15-2 of this EIAR, which will be finalised and confirmatory detailed provisions in respect of traffic management agreed with the Road Section of GCC prior to construction and contact will be maintained with the Road and Traffic Section throughout the construction phase. Mitigation measures outlined in Appendix 15-2 include the following:

- The bush / shrubs on the south side of the R332 are trimmed in order to maximise forward visibility. It is estimated that a forward visibility of approximately 140m may be achieved by trimming the roadside bushes alone.
- An application to Galway County Council for a temporary reduction of the speed limit on this section of the R328 to 60 km/h during the 18 month construction phase of the Proposed Project,
- The introduction of Traffic signs in accordance with the *“Traffic Signs Manual, Section 8 – Temporary Traffic Measures and Signs for Road Works”* (DoT now DoTT&S) and *“Guidance for the Control and Management of Traffic at Roadworks”* (DoTT&S). The proposed traffic management measures will be submitted to Galway County Council’s Roads section for agreement prior to the construction phase.
- The provision of a flagman at all times that the proposed access junction is in use during the construction phase.
- The closure of the site access by means of temporary fencing and gates during periods when the access is not in use, including evenings during the construction phase.
- The permanent closure of the site access junction on completion of the construction phase. This junction will only be opened for the purpose of the replacement of large component parts.

Following the implementation of all mitigation measures outline above and in Chapter 15.1.12, will ensure a controlled and efficient operation during this stage, and minimise the impacts on local road users by safeguarding the carrying capacity and safety of the regional and local road network.

Traffic safety and the impact to the public road

The details of traffic effects of the construction of the Proposed Grid Connection is detailed in Section 15.1.7 of Chapter 15 of the EIAR. A majority of the route will require a road closure at the point of construction during the construction of the Proposed Grid Connection. A precautionary scenario where a road closure will be required for the entire route is assumed for the purpose of the assessment. The potential diversions identified will result in low volumes of existing traffic on local roads being diverted onto other local roads, or onto roads of a higher standard, including the N63, R332 and the R347.

Diversion routes are included in the TMP, incorporating all the mitigation measures and will be finalised and confirmatory detailed provisions in respect of traffic management agreed with the road's authority and An Garda Síochána prior to construction works commencing on Site. The implementation of the mitigation measures included in the proposed TMP will ensure a controlled and efficient operation during the construction phase, and minimise the impacts on local road users.

The underground cabling route that forms the Proposed Grid Connection to Cloon 110kV Substation is located entirely within the public road corridor. Third party consent is therefore not required for works along the Proposed Grid Connection and instead subject to a Road Opening License which is controlled by GCC. The Proposed Grid Connection has been fully assessed within the EIAR but has not been applied for as part of the application subject to this response.

2.8.3 **Climate and Environment**

GCC Climate Unit and Environment Department note their support of wind energy production, where appropriate, as wind energy is a crucial element of Ireland's decarbonisation plans. Observations are made in regard to the following items:

- **Impact on surrounding environment** - GCC note the site of the Proposed Wind Farm is primarily agricultural land and peatland and that this should be assessed in the context of opportunity cost of lost grazing land and release of carbon from disturbance of peatland sinks.
- **Carbon emissions** - GCC recommend the net carbon emissions associated with this development be assessed in detail through a complete lifecycle assessment inclusive procurement and waste management to calculate the carbon payback period.
- **Circular economy** – GCC note that decommissioning should be considered in the design phase of the project and would prefer to extend the asset's life by repowering the site and ensuring re-use of as much of the existing infrastructure as possible. Where not possible, a decommissioning plan needs to be more detailed than that offered in the application.
- **Climate Action and Environment Conditions** – GCC note that in the event of conditional grant of permission by ACP, as a minimum the environmental protection conditions recommended in their submission should be attached on behalf of the Local Authority.

Response

Impact on Surrounding Environment

Regarding the opportunity cost of lost grazing land Chapter 1 of the EIAR details the site of the Proposed Project measures approx. 355ha in area and the permanent footprint of the Proposed Project measures approx. 10.6 ha, which represents approx. 3% of the Site. It is identified further in Chapter 6 Section 6.5.2.1 of the EIAR that the extent of area to be lost to the permanent footprint of the Proposed Project for agricultural land account for 6% within both improved agricultural grassland (GA1) and

arable crops (BC1). The opportunity cost of grazing land is not significant as there is no significant change in land-use.

It is also noted that the landowners of agricultural lands with to be lost to the permanent footprint of the Proposed Project have agreed to the locations of proposed infrastructure within their folios. All landowner consents are included as part of the planning application.

Carbon Emissions

Regarding the release of carbon from disturbance of peatlands, Chapter 6 Section 6.5.2.1 of the EIAR identifies approx. 5% of cutover bog (PB4) and 0.54% of Raised Bog (PB1) will be lost to the permanent footprint of the Proposed Project. Chapter 11 Section 11.4.3 further identifies the carbon losses and savings calculations for the Proposed Project, with losses from reduced carbon fixing potential are calculated as 1.1% of total CO₂ losses, and losses from soil organic matter, i.e., CO₂ loss from disturbed soil and subsoils, as 12%. The loss of CO₂ arising from ground activities associated with the Proposed Project is calculated based on the entire Proposed Project development footprint being in “Acid Bog” and is under a precautionary scenario. Therefore, the actual CO₂ losses are expected to be lower than this value as the habitat that will be impacted by the development footprint comprises a mix of peatland, coniferous forestry, native woodland, and pastoral agriculture land rather than acid bog alone.

Based on the calculations presented in Chapter 11 Section 11.4.3.1 of the EIAR, approx. 145,705 tonnes of CO₂ will be lost to the atmosphere due to changes in the soil and ground conditions and due to the construction and operation of the Proposed Project. This represents 11% of the total amount of carbon dioxide emissions that will be offset by the Proposed Project. The CO₂ that will be lost to the atmosphere due to changes in soil and ground conditions and due to the construction and operation of the Proposed Project will be offset by the Proposed Wind Farm in approximately 44 months (3.6 years) of operation.

In addition, Appendix 6-4 of the EIAR includes for a Biodiversity Management and Enhancement Plan (BMEP) for the Proposed Project and details enhancement activities such as planting of hedgerow and native woodland and the creation and enhancement of wet grassland habitat. These activities, over the lifetime of the Proposed Project have the potential to give rise to carbon savings; though this potential has not been quantified in the carbon saving calculations detailed in Chapter 11 Section 11.5.3 of the EIAR. The BMEP enhancement/management on the Proposed Wind Farm site will result in an increased capacity of carbon storage due to the carbon storage potential that exists within these habitats.

Circular Economy

A Decommissioning Plan has been included as Appendix 4-6 of the EIAR. The Decommissioning Plan outlines an overview of the works methodologies that will be adopted throughout decommissioning, sets out details of the environmental controls to be implemented on site including the mechanisms for implementation, waste management, general Health and Safety measures, and Emergency Response Procedure during the decommissioning phase of the Proposed Project.

It is intended that decommissioning process will remove all the remaining elements i.e., above ground components and underground cabling from the Proposed Wind Farm, and reinstate areas where infrastructure is removed. The relevant components will be removed from the Proposed Wind Farm site for re-use, recycling or waste disposal. Many construction materials can be reused several times before they have to be disposed of:

- Electrical wiring can be reused on similar wind energy projects.
- Elements of the turbine components can be reused but this will be determined by the condition that they are in.

If a certain type of construction material cannot be reused onsite, then recycling is the most suitable option. The opportunity for recycling during decommissioning will be limited and restricted to components of the wind turbines.

All access roads and hardstanding areas forming part of a site roadway network will be required by the ongoing farming operations and therefore will be left in situ for future use. The Proposed Grid Connection underground cabling will remain in place as it will be under the ownership and control of ESB Networks and EirGrid.

The Decommissioning Plan will be updated prior to the end of the operational period in line with decommissioning methodologies that may exist at the time and will agree with the competent authority at that time. The potential for effects during the decommissioning phase of the Proposed Wind Farm has been fully assessed in the EIAR.

The Applicant notes the GCC observations above and commits to the implementation of all mitigation measures outlined in the EIAR and NIS.

Recommended Conditions

GCC identify that whilst they have indicated their view on the Proposed Project under the sections outlined above, in the event that ACP decide to grant planning permission for the Proposed Wind Farm, the recommended 28 no. conditions in the GCC Report should be attached.

Response

The Applicant welcomes the majority of conditions recommended by GCC in their report. However, in the event that the Commission decide to grant planning permission, the Applicant wishes to make the following observations in relation to Condition No. 15, 19 and 28.

Recommended Condition 15

Prior to commencement of development, details of the following shall be submitted to, and agreed in advance with the area engineer and agreed in writing with, the planning authority:

- i. *Technical & structural pavement analysis such as Level 1 and Level 2 pavement analysis that includes recommended Falling Weight Deflectometer (FWD) Testing, Ground Penetrating Radar (GPR) and core logs shall be provided to assess the pavement stress and strains at the critical design locations as required are to be calculated on proposed regional and local road trafficked routes, including number of axles to failure calculation requires verification.*
- ii. *Structural evaluation of all trafficked regional and local road network structures shall be evaluated and assessed for trafficked loads being generated by development.*
- iii. *The Applicant shall submit the following in support of the proposed development: Prior to commencement of the development, the applicant shall commission a road safety audit (stage 1 / stage 2 audit). Recommendations arising from the audit, or alternative measures proposed therein by the developer and accepted by the auditor, shall be incorporated into the final design of the development at the expense of the developer. The audit shall be completed by an independent road safety auditor, at the developer's expense, and shall be submitted for the written approval of the planning authority.*
- iv. *Prior to commencement of the development, A design report shall be submitted to Roads & Transportation Dept and to the satisfaction of the Area Engineer in accordance to TII standards 'DN-GEO- 03030 Design Phase Procedure for Road Safety Improvement Schemes, Urban Renewal Schemes and Local Improvement Schemes' whilst on receipt of detailed design works to public road physical alterations including Road widening, Road make up materials, specifications and finishes that includes Drainage infrastructure and necessary visibility works which shall be further assessed as part of the Road Safety Audit Report.*
- v. *Prior to commencement of development, and to the satisfaction of the Planning Authority, The applicant shall Submit a revised site layout plan to demonstrate sight distance triangles from trafficked junctions clearly showing details of both exit and entry sightline triangles and details of the vertical alignment available in the form of a longitudinal section in order to depict the existing road profile sightlines in both directions in respect of vehicular entrances. The required visibility from the proposed entrance and access to/from the local road network should strictly comply with Galway County Development plan 2022-2028 per DM Standard 28 and TH standards, in particular the provisions of visibility requirements as stated within Table 5.4 and Table 5.5 of TII Publications - DN-GEO-03060 Geometric Design of Junctions (priority junctions, direct accesses, roundabouts, grade separated and compact grade separated junctions) May 2023 for the design speed of the road from an x-distance 3m setback from the road edge and measured along the y-distance to the nearside road edge at specified object height from the dwell area to the sightline distance in accordance to TII standards. Forward visibility and stopping sight distances pertaining to right hand turning movements shall also be presented in both directions for each entrance in accordance to TII standards. The current extents of current hedgerow and/or boundary walling shall be set back to achieve clear and unobstructed sightlines in both directions and replaced with soft landscaping with new roadside passively safe boundary treatments proposed. Visibility splays as proposed over*

- existing hedgerow (i.e through unpaved areas) is not an acceptable permanent visibility measure to the form of the proposed development junction which can increase traffic conflicts to vulnerable road users and unaware public road users.*
- vi. *A letter(s) of consent from any adjoining landowner and relevant third parties consenting to set back their boundary in order to permanently achieve clear and obstructed required sight distances where current sight distance y- splay traverses through adjoining third party boundary is required.*
 - vii. *The applicant shall demonstrate that any adjoining lands to achieve required sight distance triangles as referred to above are within their control i.e. sightlines triangles outside the applicants red line boundary shall be outlined in blue on a revised site location map as per Article 22 (2)(b)(ii) of the Planning and Development Regulations, 2001(as amended).*
 - viii. *Sight distance triangles shall be maintained and kept free from boundary walling, vegetation, or other obstructions that would reduce the minimum visibility required.*

As detailed in Section 2.8.2.1 above, a detailed TMP incorporating all the mitigation measures is included as Appendix 15-2 of the EIAR, which will be finalised and confirmatory detailed provisions in respect of traffic management agreed with the Roads Department of GCC prior to construction and contact will be maintained with the Roads Department of GCC throughout the construction phase. As the proposed site entrance off the R332 will be managed in accordance with the above and will only be in use during the construction phase, letters of consent from adjoining landowners and relevant third parties and revised site layout plans depicting permanent sightlines are not considered to be required. Therefore, site location maps with a revised blue line boundary are also not required.

Recommended Condition 19

- iii. *The applicant shall avoid deliveries utilizing the R332 during the Kilbannon to Kilconly road widening and realignment works.*

The Applicant commits to avoid deliveries as part of the construction phase of the Proposed Project during the road widening and realignment works between Kilbannon and Kilconly Co. Galway, however notes that the construction of the works, currently underway as Q1 2026, are unlikely to interact with the construction phase of the Proposed Project, which assumes a latest construction year of 2028 as outlined in Section 15.1.3.2 of Chapter of the EIAR.

Recommended Condition 28

Unless otherwise agreed in writing with the Planning Authority prior to the commencement of development, the applicant/developer shall pay €690,792.00 to the Planning Authority, unless a phased payment schedule has been agreed in writing with the Planning Authority. This charge has been calculated using the Development Contributions Scheme adopted by Galway County Council in accordance with the provisions of Section 48 of the Planning and Development Act 2000 (as amended):

The makeup of this sum is detailed in the list below:

- A charge of €10,760 per megawatt capacity applies. The application details refer to an output of 64.2MW (10,760 x 64.2= 690,792.00)

REASON: So that the developer shall pay an equitable portion of the cost of the services which facilitates and/or which will facilitate the proposed development

The Applicant notes the formula used to determine the sum detailed above reflects a generating capacity of 64.2MW, which falls within the generating capacity range of the Proposed Wind Farm, as outlined in Chapter 1 Section 1.4 of the EIAR generating capacity between 54-64.8MW. The Applicant commits to payment of the sum that is reflective of the final installed capacity on the Site to the Planning Authority.

2.10 Tuam & Ballinasloe Municipal Districts

Members of the Tuam Municipal District and Ballinasloe Municipal District also provided the observations below in relation to the Proposed Project. A brief response to each issue raised is provided below.

2.10.1 Landscape Sensitivity

Members of the Tuam Municipal District and Ballinasloe Municipal District consider that the scale of the development, comprising 9 proposed turbines, is not in keeping with the landscape sensitivity of the area and note that the scale of the proposed development would have an adverse impact on the local built environment.

Response

As outlined in Section 13.7.3.1.1 of Chapter 13 of the EIAR, the landscape of the Proposed Wind Farm will undergo changes by the introduction of the proposed turbines as vertical, man-made structures within the material area of the site. This will result in a ‘Substantial’ magnitude of change to the landscape in localised areas within the Site, however, as per the landscape classifications outlined in the Galway County Development Plan 2022-2028, the proposed turbines are located within an area classified as ‘Low’ sensitivity.

The proposed turbines are located within a landscape of the same general type and character – that of modified working landscape comprising agricultural fields, commercial forestry and cutover bogs – which are landscape types effectively capable of absorbing wind energy development. Considering the overall “Low” landscape sensitivity rating (lowest rating in Co. Galway) of both the Proposed Wind Farm site and the entire LVIA Study Area, it is relevant that all proposed turbines are sited within similar landscape types which have been assessed and concluded as being effectively capable of absorbing the development.

The Biodiversity Management and Enhancement Plan (BMEP) included as Appendix 6-4 of the EIAR will have the dual effect of providing ecological enhancement to the landscape area of the Proposed Wind Farm site as well as potential screening of some lower lying infrastructure of the Proposed Wind Farm, thereby ultimately mitigating effects on landscape character during the operational phase.

It is concluded that no significant landscape effects are likely to occur on landscape character in the LVIA Study Area or the perceptual and aesthetic character of the Site

2.10.2 Local Area Renewable Energy Strategy

Members of both Municipal Districts note that one turbine and associated works are located within the Tuam Municipal District and object to any part of the proposed development taking place within the Tuam MD, as this area falls within a LARES designation and is not deemed appropriate for such development. They therefore request that this element of the proposal be excluded from consideration.

Response

As detailed in Section 2.2 of this response document, the Applicant welcomes GCC’s assessment that the principle of development of the Proposed Wind Farm is acceptable, subject to the assessment of the proper planning and sustainable development. The wind energy zoning and principle of development are discussed in detail in the Planning Report which accompanied the planning application.

2.10.3 Road Infrastructure

Members of both Municipal Districts note that the scale and siting of the Proposed Project would adversely impact the local road infrastructure, which is not of a suitable standard for the heavy transport of equipment and construction materials.

Response

The turbine delivery vehicles for the construction phase of the Proposed Project have been modelled in the swept path assessments for the Site, as detailed in Chapter 15 of the EIAR. It should also be noted that while there will be abnormally sized vehicles associated with the Proposed Project, all axle loads will be within weight accepted limits.

As outlined in Table 15-1a of Chapter 15 of the EIAR, roads condition surveys pre-construction surveys will be completed in accordance with TII recommendations and requirements of Galway County Council Roads Department. A pre-condition survey of roads associated with the Proposed Project will be carried out prior to construction commencement to record the condition of the roads. A post construction survey will be carried out after works are completed. Where required the extent and timing of these surveys will be agreed with the local authority, as set out in the Traffic Management Measures, included set out in Section 15.1.12.5 of Chapter 15 of the EIAR.

2.10.4 Water Quality

Members of both Municipal Districts consider that the scale of the Proposed Project would have an adverse impact on consumable water resources and is not in keeping with the protection of major drinking water sources for the local population.

Response

As outlined in Chapter 9 Section 9.5.2.1 of the EIAR, the potential effects on the Mid-Galway Public Water Scheme (PWS) Source Protection Area (SPA) and Barnaderg Group Water Scheme (GWS) were assessed. Potential pathways identified include groundwater flowpaths and recharge (quality effects), alteration/disruption of groundwater conduits/flowpaths in the bedrock aquifer (quantity and quality effects) as well as surface water flowpaths in the Lecarrow 30 Stream. The pre-mitigation impact of the Proposed Project is considered to be negative, slight, indirect, short term, unlikely effect on PWS/GWS source quality and quantity. As a result, the following mitigation is proposed at all construction works areas inside the SPA:

- No storage of fuels, oils, cements, or chemicals will be permitted within the SPA
- Refuelling of mobile plant (i.e. diggers, dumpers etc) will only be permitted outside the SPA;
- Refuelling of large immobile plant (i.e. cranes) will only be carried out with a refuelling truck that will be removed from SPA immediately after use;
- Spill kit stations will be present at each turbine location (T1 & T2), temporary construction compound and along the Proposed Grid Connection cable route works areas;
- There are no proposed peat or spoil repositories within the SPA as part of design mitigation;
- A geotextile liner will be placed below the founding layer (lean mix concrete) where concrete is to be poured. These both prevent vertical loss of wet concrete at turbine bases;
- Use of perimeter shuttering at turbine basis to prevent lateral loss of wet concrete;
- All temporary cement washout lagoons will be located outside the SPA;

- Works inside the Lecarrow Stream 50m watercourse buffer limited to 1 no. proposed watercourse crossing culvert which will be clear spanning;
- No wind farm drainage will be released inside the 50m watercourse buffer on the Lecarrow 30 Stream;
- No wind farm drainage will be released inside the 30m buffer for the 1 no. potential enclosed depression/doline mapped inside the SPA at the Proposed Wind Farm site
- Drainage control measures at works areas along the Proposed Grid Connection (Refer to Section **Error! Reference source not found.** below); and,
- There will be clear signage in place inside the refined SPA to remind construction workers that the area is inside a drinking water protection area.

Due to the local hydrogeological and hydrological regime, and following the implementation of proposed design and mitigation measures, no significant residual effects on the Mid Galway PWS/Barnaderg GWS sources will occur.

2.10.5 Peatland

Members of both Municipal Districts state that the impact of the Proposed Project on traditional boglands in the area would be unprecedented and are of the opinion that the proposed mitigation measures for peatland disturbance are insufficient, resulting in long-term environmental impacts.

Response

The peatland habitats identified within the Site have been described in full in Chapter 6 Sections 6.4.1.3.1 and 6.4.1.3.2 of the EIAR. Based on the condition assessment and detailed relev  data provided in Appendix 6-1 of the EIAR, the location of the proposed new floating road between T7 and T9 does not correspond to the Annex I habitat *Rhynchosporion depressions (7150)*. It also does not correspond to the Annex I habitat *Active Raised Bog (7110)*. However, by taking a precautionary approach, approximately 285m of the proposed new floating access road between T7 and T9 correspond to the Annex I habitat *Degraded raised bogs still capable of natural regeneration (7120)*. As discussed in Section 2.6.5 above, the loss of raised bog (PB1), amounts to 0.54% of the total habitat area within the Site. Prior to mitigation this will result in a permanent, significant effect on a receptor classified as County Importance.

Additionally, the Proposed Project will result in the direct loss of approximately 5% of the total cutover bog (PB4) habitat within the Site which has been assessed as a permanent significant effect on a receptor of Local Importance (higher value) in the absence of mitigation.

A Biodiversity Management and Enhancement Plan (BMEP) has been provided in Appendix 6-4 of the EIAR. Mitigation measures will be implemented to minimise the works area and avoid any loss of peatland habitat outside the Proposed Project footprint. Where excavation is required, all turves and sub-peat arising from the initial construction phase will be used to provide a layer of peatland vegetation on top of proposed peat repository areas in the site. Additionally, areas within the Proposed Wind Farm site classified as cutover bog (PB4) (either with current extraction activities or past extraction activities) which are recolonizing with scrub vegetation have been identified as potential enhancement areas. As detailed in Appendix 6-4, all current or ongoing extraction activities will cease, and all native scrub/broadleaved woodland species will be allowed to colonize this habitat area.

It is concluded that with all mitigation measures prescribed in Section 6.5.2.1.2 of the EIAR, there will be no residual significant effects on peatland habitats adjacent to the development footprint of the Proposed Project. However, it has been concluded that there is potential for significant residual effects on peatland habitats at a County Importance.

While this is still considered a significant residual effect due to the mapped Article 17 habitat when taking a precautionary approach in classification, the area to be lost is relatively small in comparison to

the larger raise bog habitat area within the Site and insignificant in comparison to the corresponding area of mapped Article 17 habitat across the County.

2.10.6 Tourism and Development

Members of both Municipal Districts are of the view that the intensification and concentration of large-scale SID projects within the district is not in keeping with sustainable development and could constitute overdevelopment of the district as a whole. They emphasise the need to protect the built environment for future development in tourism, amenities, and other rural projects. It is stated that as the Tuam Municipal District is mapped under the Galway County Council Development Plan 2022–2028 and the Galway County Transport and Planning Study (GCTPS), such developments should be assessed in line with these frameworks.

The areas within the townlands of Cloondahamper, Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally, and Slievegorm are strong rural communities. Members of both Municipal Districts consider that, if granted, such a development could significantly reduce the potential for new rural housing and hinder the protection and future growth of the rural population.

Response

Effects of the Proposed Project regarding development in tourism, amenities, and other rural projects is considered within Chapter 5 of the EIAR, which has been assessed in line with the Galway County Development Plan 2022-2028. The Proposed Wind Farm footprint is small in scale relative to the Site and Population Study Area. In combination with its ability to coexist with ongoing Site activities and activities within the landscape indicate that the Proposed Wind Farm will not impact significantly on other land-uses within the Site and the wider area. Based on the literature review in Section 5.4, the majority of studies indicate that wind farm developments do not deter visitors to tourist attractions or scenic landscapes where turbines are visually evident. There are no key identified tourist attractions pertaining specifically to the Site, the nearest identified tourist attraction is the Knockmoy Abbey ruins, located c. 5.4km southwest of the proposed site just outside the village of Abbeyknockmoy, Co. Galway. As such, it is considered that the Proposed Project will have a long-term imperceptible negative impact of visitor experience to attractions in the wider landscape.

There will be significant direct and indirect effect on local communities from investment during the operational phase as a result of the Community Benefit Fund, which promotes significant, positive change in the local area. The number and size of grant allocations will be decided by a Community Fund liaison committee with various groups and projects benefiting to varying degrees depending on their funding requirement, which can directly contribute to development of rural projects in the area surrounding the Site. Precedence for the coexistence of wind energy developments and growth in development and tourism in rural areas can also be seen notably in the Galway Wind Park in Connemara, which includes a range of recreational trails in Co. Galway and Sliabh Bawn Wind Farm in Co. Roscommon, which also includes recreational, fitness and equestrian amenities.

As detailed in Section 5.10 of Chapter 5 of the EIAR, the construction and operational phase of the Proposed Project will have no effect on the population of the area with regard to changes to trends, population density, household size or age structure, nor will the Proposed Project prevent growth of the surrounding rural population in line with identified demographic trends for the Study Area.

3. **CONCLUSION**

This response document has been prepared to address concerns raised in the observations made in respect of planning application reference ABP Ref. 323761 regarding the Proposed Project. The information provided in this document will directly assist the Commission in their ongoing consideration of the planning application.

It is re-iterated here that a robust EIAR and NIS were carried out and accompanied the planning application for the Proposed Project, and this is demonstrated by the fact that detail from the EIAR has been reproduced and/or referenced in this document in order to respond to the majority of observations made. It is our view that the information provided within this document is confined to the issues raised within the observations received by the Commission and there is no additional information provided that would be considered 'significant' or 'material'.

The information provided in this document constitutes a full and robust response to the matters raised and we trust that this allows the Commission to progress with their assessment of the Proposed Project.