

Re: Cooloo Wind Farm (ACP Ref. 323761)

Comments on Applicant's Response to Submissions

I wish to make the following comments on the Applicant's Response to Submissions dated 27 February 2026.

Having reviewed the Applicant's response, I remain concerned that a number of significant planning, environmental and residential amenity issues have not been satisfactorily addressed. In many instances, the response reiterates conclusions previously presented in the EIAR and supporting documentation rather than providing additional evidence to resolve the concerns raised by local residents and observers.

1. Landscape and Visual Impact

The proposed development comprises nine turbines with a tip height of 180 metres. These structures would become dominant features within the local landscape and would fundamentally alter the rural character of the area.

While the Applicant relies on the conclusions of its Landscape and Visual Impact Assessment, the response does not adequately address the lived experience of residents whose homes overlook the site. The visual impact is not simply a matter of visibility but of scale, prominence and the continuous presence of industrial-scale structures within what is currently a rural agricultural landscape.

The Applicant's response focuses on technical compliance rather than whether the resulting landscape change is acceptable from the perspective of residents and communities living in Barnaderg and the surrounding areas.

The cumulative impact of turbine height, turbine movement, aviation lighting and visual dominance over a prolonged operational lifetime must be carefully considered. The development would introduce an industrial character into a landscape that is presently rural in nature and would have long-term consequences for residential amenity and landscape character.

1. Conflict with Local Planning Policy

The Applicant acknowledges that part of the project area is located within lands classified as "Generally to be Discouraged" for wind energy development under the Galway Local Authority Renewable Energy Strategy.

While the Applicant argues that such areas are not automatically excluded from development, the existence of this designation reflects recognised constraints and sensitivities identified through the local planning process.

The fact that national or county renewable energy targets remain to be achieved should not in itself justify development in areas that local planning policy has identified as unsuitable or less suitable for wind energy infrastructure. The Commission should carefully consider whether the proposal is consistent with the objectives and intent of the local planning framework.

1. Residential Amenity

The Applicant repeatedly relies on compliance with guideline thresholds for noise and shadow flicker. However, compliance with minimum standards does not necessarily mean that impacts on residents will be insignificant.

The response relies heavily on future mitigation measures, monitoring programmes and turbine control software to address potential impacts. This approach effectively accepts that impacts may occur and proposes to manage them afterwards rather than avoiding them through project design.

For residents living within sight of the turbines, the cumulative effect of visual intrusion, turbine movement, aviation lighting, operational noise and shadow flicker should be considered in a holistic manner rather than as separate technical assessments.

The Applicant notes that up to 171 sensitive receptors are theoretically predicted to experience shadow flicker and proposes mitigation measures including turbine control software and vegetation screening. While mitigation may reduce impacts, the extent of predicted exposure demonstrates that the issue remains significant and should be given careful consideration by the Commission.

1. Human Health and Wellbeing

I remain concerned that the Applicant's response gives insufficient consideration to the potential impacts of the proposed development on human health, wellbeing and quality of life for residents living within sight of the turbines.

While the Applicant states that there is no conclusive scientific evidence linking wind turbines directly to adverse health outcomes, this does not remove the obligation to consider the effects of environmental noise, sleep disturbance, stress, visual intrusion and loss of residential amenity on nearby residents.

The World Health Organization has recognised environmental noise as an important public health issue and has identified sleep disturbance, annoyance and reduced quality of life as relevant considerations when assessing environmental noise exposure.

Even where noise levels comply with regulatory limits, adverse effects on wellbeing may still occur for some individuals, particularly where noise is persistent or occurs in otherwise quiet rural environments.

Particular consideration should be given to:

- Potential sleep disturbance arising from turbine noise and amplitude modulation.
- Stress and anxiety associated with the continuous presence of large industrial structures within the surrounding landscape.
- Potential impacts on individuals with sensory sensitivities, autism spectrum conditions and other neurodiverse conditions.
- The cumulative effect of noise, shadow flicker, turbine movement, aviation lighting and visual dominance on quality of life.

The Applicant acknowledges that some residents may experience greater sensitivity to environmental effects yet relies largely on complaint-based monitoring and post-construction mitigation. This places

the burden on affected residents after impacts have occurred rather than ensuring that impacts are avoided in the first instance.

Given the scale of the proposed turbines, their proximity to established homes and the acknowledged uncertainty surrounding individual sensitivity to environmental impacts, the precautionary principle should be applied when assessing the potential effects of the development on human health and wellbeing.

1. Peatland and Biodiversity Concerns

I remain concerned regarding the acknowledged loss of peatland habitat and the potential alteration of local hydrology associated with the development.

The Applicant accepts that the proposed floating road between Turbines T7 and T9 will result in the loss of raised bog habitat and acknowledges residual significant effects in relation to peatland habitats and drainage changes.

Where residual significant effects remain after mitigation, it is difficult to conclude that the environmental impacts have been fully resolved. This is particularly important given the national importance of peatlands for biodiversity, carbon storage, climate regulation and water management.

The proposal should therefore be assessed with particular caution given the acknowledged residual impacts and the sensitivity of peatland ecosystems.

1. Loss of Hedgerows and Ecological Connectivity

The response confirms that substantial lengths of hedgerows and other linear habitats will be removed and replaced through future planting programmes. The Applicant proposes replacement planting and biodiversity enhancement measures to offset these losses.

However, replacement planting cannot immediately replicate the ecological value of mature hedgerows and treelines that have developed over many decades. There will inevitably be a lengthy period during which ecological connectivity is reduced and habitats used by birds, bats and other wildlife are lost or fragmented.

The Applicant itself acknowledges temporary residual effects associated with habitat removal and replacement. These impacts should be given appropriate weight in the overall assessment.

1. Community Concerns

The substantial number of observations and submissions received demonstrates the level of concern that exists within the local community regarding the scale, location and potential impacts of the proposed development.

Although the Applicant refers to consultation activities and community engagement initiatives, the response does not clearly demonstrate how the concerns raised by local residents materially influenced the final design of the project or how those concerns have been satisfactorily resolved.

Meaningful consultation should not be measured solely by the number of engagement events undertaken but by the extent to which concerns raised are reflected in project design and decision-making.

1. Community Benefit Fund

The Applicant places considerable emphasis on the proposed Community Benefit Fund and associated financial contributions to the local area.

While community funding may provide benefits to some organisations and groups, financial benefits should not be regarded as mitigation for environmental impacts, landscape impacts or loss of residential amenity.

The planning merits of the proposal must be assessed independently of any financial incentives associated with the development.

Conclusion

The Applicant's Response to Submissions does not adequately resolve the substantive concerns raised regarding landscape character, visual amenity, residential amenity, human health and wellbeing, biodiversity, peatland impacts and compliance with local planning policy.

The proposal would introduce industrial-scale turbines into a sensitive rural landscape, would adversely affect residential amenity, and would result in environmental impacts that the Applicant itself acknowledges cannot be fully eliminated.

Accordingly, I respectfully request that An Coimisiún Pleanála give careful consideration to the outstanding concerns relating to landscape, residential amenity, human health, biodiversity, peatland impacts and planning policy compliance when determining this application and apply the precautionary principle where uncertainty remains regarding long-term environmental and community impacts.