RESPONSE TO THE APPLICANT'S RESPONSE TO SUBMISSIONS

Proposed Cooloo Wind Farm

ACP Ref. 323761

Submission to An Coimisiún Pleanála

Prepared in response to the Commission's letter dated **5 June 2026** inviting submissions on the Applicant's responses to third-party observations and the Galway County Council report.

A number of concerns I highlighted in my original observation have not been adequately addressed by the applicants in their response to 3rd party submissions.

I outlined a litany of short comings, omissions and rebuttals in response to the applicants EIAR in relation to ornithology. I will outline below the points and concerns that have not been addressed;

In section 2.6.4.4.1 in the applicants' responses to concerns raised about the potential impacts on whooper swans, they have failed to address a number of concerns I highlighted.

- On page 32 of Chapter 7 of EIAR of the planning application it is stated that "Whooper swan was observed in the winter and passage season. Raw survey data and maps are provided in Appendix 7-4. Survey data and maps relating to roosts are provided in Confidential Appendix 7-5." However this isn't true. There is no raw survey data or maps provided in Appendix 7-4 pertaining to Whooper Swans. The applicants have not addressed this omission in their response.
- Additionally, there is no flight path study carried out or illustrated, which shows movement between the water bodies. It is stated that there were "118 observations were of birds flying or travelling through the Proposed Wind Farm site and surrounding area" (pg 33 of chapter 7 EIAR) however no diagrams or maps of the flight paths was provided. The proposed windfarm study lies in the middle of 6 significant water bodies: Horesleap Lough, Summerville Lough, Barnaderg Turlough, Levally Lough, Gerteenlahard Turlough, Carrownabo Turlough. This is highlighted in the EIAR in the waterbird distribution survey of whooper swans"There were 13 records of flocks within 500m of the proposed turbine locations, occurring over 11 survey days. Flocks between 5 and 83 birds were foraging and roosting on grassland. The remaining 127 records were in the wider surroundings. The majority of these birds were associated with waterbodies in the wider surroundings (Barnaderg Turlough, Carrownabo Turlough, Gorteenlahard Turlough, Levally Lough, Horseleap Lough and Summerville Lough), but there were also observations in fields, such as at Mullaghmore. They were recorded swimming, roosting and foraging and in maintenance behaviours such as preening"(pg 33 of Chapeter 7

of EIAR). As I already pointed out, no flight path maps or survey data was provided to take into account the movement of whopper swans between these water bodies and feeding grounds. A robust survey of the whopper swans movement on the site and the adjoining waterbodies, using GPS trackers should have been carried out, to conclusively verify the movements between the different feeding and roosting areas and the loughs/turloughs. I do not believe that this concern was adequately addressed by the applicants in their response

In section 2.6.4.4.2 in the applicants' responses to concerns raised about the potential impacts on Golden Plover, they have failed to address a number of concerns I highlighted. I queried the mitigation methods proposed for Golden Plover.

Golden Plover are Listed on Annex I of the EU Birds Directive (2009/147/EC). The Birds Directive (Directive 79/409/EEC) was adopted in 1979. It is one of the first pieces of environmental legislation to be adopted by the EU. It was amended in 2009 (Directive 2009/147/EC) - changes were made to Annex II part B due to the accession of new Member States. **The Birds Directive requires all Member States to protect all wild bird species and protect and restore their habitats.** The primary legislation transposing the Nature Directives (Birds and Habitats Directives) into Irish law is the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), as amended. The Golden Plover is also a Red-Listed Species of Conservation Concern (Gilbert et al. 2021) The Red Lists are an assessment of the risk of extinction of each species and not just an assessment of their rarity.

In the applicants response they acknowledged that there has not been an opportunity to test the effectiveness of tethered bird control kites in reducing collisions at windfarms. The applicants have suggested a bird monitoring programme to monitor the effectiveness of this mitigation plan. The information collected in during this monitoring will inform how this mitigation measure will be used in the future. From my perspective what the applicants are proposing is to essential make it up and they go along. A reactionary rather than a tried and tested approach. As I already outlined in my initial submission the approach proposed by the applicants is aspirational and the plan is to displace and deter Golden Plover from using the area in the hope that they'll find other suitable foraging and roosting grounds isn't and shouldn't be acceptable. A reliable, proven mitigation plan hasn't been put in place to protect this Annex I redlisted species of National Importance. Therefore, its incumbent upon An Coimisiún Pleanála to refuse permission to develop Cooloo Windfarm, as allowing it to proceed would displace, disturb, and threaten this protected species.

In section 2.6.4.4.3 the applicants attempt to address the concern raised about the lack of mitigation measures in relation to Hen Harrier. The applicants have stated that "No mitigation measures are

specifically proposed for hen harrier". Instead they have situated the nearest turbine only 700 metrers away to avoid the roosting site at Cloonboo More. No mitigation measures have been suggested to avoid collision risk with blades etc while the Hen harrier is foraging or travelling through the proposed site.

In 2.6.4.4.4 the applicants did not address information of concerns I presented in relation to Barn Owls in the area. I provided video and visual evidence of a Short-eared or Barn owl less than 200m from the proposed site. The applicants did not acknowledge that this evidence was presented.

The applicants have failed to acknowledge or address concerns I raised in relation to the cumulative impact of potentially two wind farms within close proximity to each other and in proximity to waterbodies used by key ontological receptors.

The applicants have failed to address or acknowledge the cumulative impact of two potential windfarms situated near two significant water bodies; Levally Lough and Summerville Lough. They have failed to investigate the impact this will have on the Key Ornithological Receptors that roost, forage and move between the two Loughs. The two Lough's have been sited in Chapter 7 of the EIAR of the Cooloo Windfarm and in Chapter 7 of the Clonberne Windfarm application. The two loughs were used in the waterbird distribution surveys and are referenced in the respective appendixes of both applications in the Survey Effort appendix.

I have researched the documents from both EIAR and have verified the distances in relation to the two proposed developments;

- Summerville Lough is 6.5km from Proposed Clonberne Windfarm
- Summerville Lough is 3.1km from the nearest proposed turbine in Cooloo Windfarm
- Levally Lough is 2km south west from proposed Clonberne Windfarm
- Levally is 3.9km north west of the proposed Cooloo Windfarm

LEVALLY LOUGH

Levally Lough is a turlough, or periodically dry lake, located in County Galway, approximately 9 km east of Tuam. It is a SAC(Special Area of Conservation) known for its unique ecosystem, especially its rich birdlife and aquatic vegetation, and is also popular for fishing for species like salmon and pike. It is one of the wettest turloughs in Ireland, often remaining flooded for long periods or even not emptying fully in some years.

Geographic and ecological features

- Type of body of water: Levally Lough is classified as a turlough, a karst feature that can be submerged for long periods.
- Location: It is situated in the northeast of County Galway, about 9 km east of Tuam.
- Size: The lough is approximately 1.9 km long and 1.1 km wide, covering an area of about 1.23 km².
- Ecological status: It is designated as a Special Area of Conservation (SAC) due to its ecological significance.
- Water and vegetation: The lough often has a high water level and contains marl (precipitated calcium carbonate) and aquatic vegetation, including willows.
- Birdlife: It is particularly noted for its diverse and rich birdlife, supporting both wintering and summer waterfowl.

SUMMERVILLE LOUGH

This is a lake that is being considered by the National Parks and Wildlife Service for designation as a potential NHA (site code 001319). As an ecological habitat it is important, with whooper swan, wildfowl and otters residing here. Geologically it is certainly of County Geological Site importance owing to the long distance the sinking water traced from its basin travels underground: an impressive 10 Km.

A swallow hole occurs at the southeastern edge of the peat flanking the lake basin, just north of Moylough Castle. The water sinking into this swallow hole was dye-traced in 2011, and the water emerged at public water supply springs at Barnaderg and (adjacent) 'mid-Galway' springs, almost 10 km to the southwest, in Derreen Townland. The lake therefore drains at high water levels into this swallow hole and subsurface, and via conduits, to the distant southwest.

<u>LIMITATIONS TO CUMULATIVE IMPACT ASSESMENT</u>

The applicants in their planning application have failed to provide any maps or diagrams to show the proximity of other proposed windfarms to the proposed Cooloo Windafrm. They have stated that the Proposed Clonberne Windfarm will be 5.2km from the Proposed Cooloo Windfarm and that is where ended.

They have failed to explore what effects the two developments will have on flight paths of birds etc. Will the development of two large wind farms with turbines or unprecedented sizes disturb or deter sensitive species from using the two sites? This is a potential that has not been addressed or investigated by the applicants.

They applicants have just gave a synopsis of what the EIARs have stated in other planned developments within 25km radius. They have not provided any studies or evidence to prove that several windfarms within close proximity to this proposed development, will have not have adverse effects on Key Ornithological receptors.

In relation to the applicant's response to concerns raised in relation to proposed biodiversity enhancement measures, monitoring etc post construction, the issue of impartial independent oversight remains. The applicants have not addressed the concerns or provided adequate information other than referring to an on-site ecologist that will over see that these proposed measures are implemented. According to EIAR the post construction monitoring of Biodiversity enhancement, and mitigation measures "will be undertaken in partnership between the Developer, the Project Ecologist and the Landowners."(Appendix 6-4, Biodiversity Management and Enhancement Plan)

In applicants response to these concerns in 2.6.4.3 and in 2.10 they commit to the implementation of a BEMP (Biodiversity Enhancement Management Plan) and to post construction monitoring of ornithological receptors. Commitments are made to submit yearly reports on ornithology monitoring and mitigation programme to NPWS and relevant planning authority. However, there is still no reference to independent oversight or on the spot checks from NPWS or planning authority. What repercussions if any will the applicants face if these commitments are not honoured? Surely relying on the on site ecologist who is employed by the applicants is a serious conflict of interest? What oversight body will ensure that the biodiversity enhancement plan, which includes hedge and tree replanting, is actually carried out?

In section 2.5.4 the applicants disregard the concerns raised around the impacts of windfarms on human health. They continue to disregard peer reviewed scientific articles etc that attribute windfarms to a myriad of adverse health effects. In my initial submission I included referenced evidence from *Evans, A. (2017)Environmental Noise Pollution: Has Public Health Become too Utilitarian? Open Journal of Social Sciences, 5, 80-109. https://doi.org/10.4236/jss.2017.55007* , who attributes infrasound from wind turbines to adversely effect the health of people.

The applicants have shown blatant disregard to any scientific evidence that rebukes their claims that wind farms have a negligible effect on human health.

In section 2.5.3 the applicants have attempted to respond to concerns raised in relation to property devaluation. The applicants acknowledge some of the findings of a 2023 working paper by the Centre for Economic Research on Inclusivity and Sustainability (CERIS) that a potential decrease in property values within 1km of a turbine. They applicants do not acknowledge the findings of the same working paper that suggests that there was an even greater devaluation of houses when the turbine height was greater than 125m. The study found that "turbine height is influential on house price within 1km, with turbines taller than 125m incurring a greater discount (-22.9%) compared to medium sized turbines (-14.4%)." It is quite clear that wind turbines have a significant negative effect on house prices within 1km. The 22% negative offset applies to turbines bigger than 125m. The study highlights a clear negative correlation between wind turbine height and property value. As the proposed turbines for the Cooloo Windfarm are anticipated to be between 180-185m in height it is fair and rational to assume that house well beyond 1km will experience devaluation, and house within 1km will experience a substantial devaluation. The applicants have failed to suggest any solution to this issue or any redress scheme to property owners within 1km who will undoubtedly experience devaluation of their properties.

Thank you for taking the time to read my response ,

Kind regards

Damien Stone