

An Coimisiún Pleanála
64 Marlborough Street
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Date: 19 June 2026

RE: AN COIMISIÚN PLEANÁLA CASE REFERENCE: PAX07.323761 – APPLICANT’S “RESPONSE TO SUBMISSIONS” FOR COOLOO WIND ENERGY DEVELOPMENT

Location: Cloondahamper, Cloonascragh, Elmhill, Cooloo, Co. Galway
Applicant: Neoen Renewables Ireland Limited

Dear Sir/Madam,

I refer to the Commission’s letter of 5 June 2026 inviting further submissions in relation to the applicant’s “Response to Submissions” for the above development. I welcome the opportunity to comment from the perspective of my original objection dated 15 November 2025.

Having reviewed the applicant’s combined response and its technical appendices, my view is that it does not resolve, and in several respects does not substantively engage with, the detailed issues raised in my submission. In particular, the response is generic in nature, relies heavily on re-assertion of earlier conclusions in the EIAR and NIS, and leaves key matters concerning water supply, soil ecology, protected species, human health, and aviation operations at Moyne Park unanswered.

1. Absence of meaningful consultation with an immediately affected landowner

The applicant relies extensively on a Community Engagement Report and on Section 2.2 of its “Response to Submissions” to assert that consultation has been “effective, open and transparent” and in line with the Draft 2019 Wind Energy Development Guidelines. That material describes a public information event, a community liaison officer, meetings with GAA clubs and a community council, and postal information drops to local households and schools.

I am the owner and occupier of Moyne House, an early nineteenth-century dwelling with a private spring well, long-established conservation habitats including corncrake meadows and wetlands, and a helipad that has operated lawfully for approximately 25 years. Despite being one of the most directly affected landowners, at no point have the applicant or its agents sought to meet me, visit my property, or discuss how the project design might impact my water supply, conservation work, or aviation operations. There has been no request to enter my lands, no site-specific consultation, and no attempt to understand or address the particular features and vulnerabilities of Moyne Park and Moyne House that I set out in detail in my original submission.

Generalised engagement with clubs, schools and a community council cannot be presented as a substitute for targeted, receptor-specific consultation with a landowner in my position. In so far as the applicant seeks to rely on community engagement as a mitigating factor, I can only describe that reliance, in relation to my property and rights, as tokenistic.

2. Mid-Galway Regional Water Supply Scheme and karst hydrogeology

My objection demonstrated that turbines T1 and T2 are located within the Zone of Contribution for the Mid-Galway Regional Water Supply Scheme, with turbines T3 and T4 and the BESS and substation compound on its boundary, within a Regionally Important karstified conduit aquifer, and in areas mapped by GSI as having extreme vulnerability and traced groundwater connections towards the RWSS intake. Uisce Éireann's own submission confirms this factual position. It states that the proposed wind farm is located within the Mid Galway Public Water Supply Zone of Contribution, that T1, T2 and the construction compound lie within the Source Protection Area, and that approximately 3.8 km of the proposed grid connection cable route is within the SPA, with depth to bedrock generally around 5 metres and reducing to the south.

Uisce Éireann then refers back to section 9.5.2 of the EIAR for the list of potential effects and to section 9.6.2 for the proposed mitigation, and requests that a series of additional construction-phase measures be attached as conditions if permission is granted. These include locating refuelling of mobile plant outside the SPA in a dedicated area agreed with Uisce Éireann, recording geotextile liner details on the risk register, employing a consultant hydrogeologist or engineering geologist to supervise foundation and grouting works, and locating lined cement washout lagoons in hardstanding areas outside the SPA with locations agreed with Uisce Éireann and supervised by a hydrogeologist.

While those additional conditions are sensible as far as they go, they do not amount to the dedicated risk assessment for the Mid-Galway RWSS that I called for. Uisce Éireann accepts the EIAR's high-level treatment of potential effects and confines itself to strengthening short-term construction controls. Neither Uisce Éireann nor the applicant has produced a specific assessment of how constructing and operating turbines, access roads and a BESS and substation compound within and on the boundary of a PWS Source Protection Area may affect the integrity, continuity, and quality of the public supply over the full life of the project. There is no additional modelling of groundwater flow along the GSI-mapped conduits I highlighted, no analysis of catastrophic failure modes such as conduit diversion or collapse, no operational-phase monitoring and trigger regime, and no commitment to the real-time aquifer monitoring, emergency response planning or financial provision for alternative supply and compensation that I set out.

In substance, the applicant and its consultants still ask the Commission to accept that generic construction drainage and pollution controls, albeit with some additional conditions suggested by Uisce Éireann, are sufficient to protect a major regional water supply serving approximately 8,000 premises in a highly vulnerable karst Source Protection Area. The fundamental procedural deficiency I identified remains: there is still no stand-alone, transparent, RWSS-specific hydrogeological risk assessment demonstrating that the development can proceed without unacceptable risk to public water supply quality or availability.

3. Soil biodiversity and turbine-induced vibration

My submission drew attention to recent peer-reviewed research showing that low-frequency vibrations from wind turbines can significantly reduce earthworm abundance and affect soil ecosystem function at distances up to at least 200 metres from turbine bases. This was not a generic biodiversity point, but a specific concern regarding turbine-induced ground-borne vibration and its implications for soil health and agricultural productivity.

The applicant's response deals with this issue only by stating that existing bog and improved grassland are of relatively limited value for earthworms and by pointing to habitat enhancement measures under the Biodiversity Management and Enhancement Plan as a net gain. The core question, namely whether soil macrofauna in both existing and new habitats will be exposed to harmful vibration regimes during the operational phase, is not addressed at all. There is no assessment of vibration propagation through soils, no discussion of the Oikos findings and no proposed monitoring of soil macrofauna or soil condition. This remains a gap in the environmental impact assessment.

4. Bats, birds, and corncrake

In relation to bats, the response reiterates that all Irish bat species are protected and states that the EIAR assessment, informed by survey work, is proportionate and in line with best practice. It does not engage with the specific concerns I raised about the absence of standardised nacelle-level acoustic monitoring and the lack of a clear operational commitment to validated curtailment systems such as ProBat or equivalent, as recommended in recent scientific literature.

On birds, including Whooper Swan and White-tailed Eagle, the applicant relies on its original collision risk modelling and states that the EIAR and NIS have adequately addressed collision risks and cumulative effects. My submission referred to recent turbine-related White-tailed Eagle fatalities in Donegal and to BirdWatch Ireland's criticism of collision risk modelling in that context and queried the reliance on unvalidated avoidance rates for sensitive species. The combined response does not address that new evidence or explain why it does not undermine the conclusions previously drawn.

On corncrake, the Natura Impact Statement is described as sufficient and the habitat measures proposed in the BMEP are emphasised. My submission explained that I have invested thirty years in habitat creation for corncrake, that these efforts align with the Corncrake LIFE project and national policy, and that the proposed turbines would be located directly in the flight and calling vicinity of that habitat. The applicant's reply does not recognise or assess the role of privately managed habitats in delivering corncrake conservation objectives and does not provide a targeted assessment of collision and disturbance risks to corncrake on and around my lands.

5. Population, human health, and neurodiversity

The TNEI report reviews international literature and concludes that there is no credible scientific evidence that wind farms cause direct health effects, while acknowledging that neurodiverse individuals may experience greater sensitivity to noise. It then relies on that literature, together with compliance with guideline noise limits and the existence of a complaints procedure, to conclude that risks are acceptable.

My submission highlighted the presence of local schools with autism classes, evidence that people on the autism spectrum can be particularly affected by low-frequency noise and visual stimuli such as shadow flicker, and previous Commission inspector reports which recognised that special-needs facilities near wind farms may become unviable. Those specific local factors and previous decisions are not addressed. Similarly, my concerns regarding the adequacy of the 2006 shadow flicker thresholds for exceptionally large turbines and the need for a more precautionary approach for vulnerable groups are answered only by restating compliance with existing and draft guideline thresholds.

In short, the applicant has not engaged with the local neurodiversity context or with the precautionary principle in relation to particularly vulnerable receptors.

6. Aviation safety and Moyne Park helipad

The Irish Aviation Authority has submitted a short response to the Commission in relation to the Cooloo Wind Farm. The IAA does not object to the application, but requests that if permission is granted the applicant be conditioned to agree an aeronautical obstacle warning lighting scheme with the Authority, provide as-constructed WGS-84 coordinates and ground and blade-tip elevations for each turbine, and give at least 30 days' notice of crane operations in accordance with S.I. 215 of 2005. The IAA submission therefore confirms that the proposed turbines are relevant to aviation safety, and that obstacle lighting and data requirements must be addressed, but it does not purport to assess the impact of the development on existing private aviation operations or on any specific helipad.

Against that background, the applicant has treated prospective compliance with these generic IAA requirements as sufficient. There is still no aviation impact assessment which examines the interaction between the proposed turbines and the established helipad and hangar at Moyne Park, which has operated lawfully for approximately 25 years. My original submission set out the approach geometry and constraints in some detail, including the location of the nearest turbine relative to Moyne House, the bearing of the approach path and the elevation difference between the helipad and turbine blades, and explained how the development would interfere with safe prevailing-wind approaches and departures. None of this material is addressed in the applicant's "Response to Submissions."

In other words, aviation safety has been recognised in principle by the IAA, but the applicant has confined itself to procedural matters such as lighting and notifications and has ignored the concrete question of whether this particular turbine layout is compatible with the continued safe operation of a long-standing existing helipad. The proportionality issues under Article 1 of Protocol 1 ECHR, concerning interference with a long-established private aviation facility on my property, also remain unexamined.

7. Conclusion

For the reasons set out above, and in my original objection, I remain of the view that the environmental impact assessment for this project is incomplete in several material respects and that the applicant's "Response to Submissions" does not resolve those deficiencies. Uisce Éireann's submission confirms that key elements of the project, including turbines T1 and T2, the construction compound and a substantial length of the grid route, lie within the Mid-Galway Public Water Supply Zone of Contribution and Source Protection Area in a shallow, highly vulnerable karst aquifer. Yet neither Uisce Éireann nor the applicant has produced a dedicated risk assessment for the Mid-Galway RWSS or demonstrated that the public water supply can be protected over the full construction and operational life of the project, beyond standard drainage and pollution control measures and some additional construction-phase conditions.

Similarly, the Irish Aviation Authority's letter confirms that the turbines are relevant to aviation safety and that obstacle lighting and crane notifications will be required if permission is granted, but it does not consider the impact on the long-established helipad at Moyne Park, and the applicant has not undertaken any site-specific aviation impact assessment in relation to that infrastructure. My evidence on approach geometry and the interference with safe prevailing-wind helicopter operations remains unanswered.

These issues sit alongside other unresolved concerns described in my objection and in this response: turbine-induced soil vibration and its impact on earthworms and soil ecosystems, the adequacy of bat and bird collision risk assessment in light of recent evidence, the treatment of corncrake and other Annex I species, and the lack of a precautionary approach to neurodiverse individuals and other vulnerable receptors. The applicant's reliance on generic assertions of compliance, on the existence of mitigation in the EIAR, and on broad climate and renewable energy policy does not cure the detailed deficiencies that have been identified.

I therefore respectfully invite the Commission to find that the information before it is insufficient to conclude, beyond reasonable scientific doubt, that the proposed development would not adversely affect the Mid-Galway Regional Water Supply Scheme, soil ecosystems, protected species, human health, or established aviation operations at Moyne Park. Applying the precautionary principle and having regard to the obligations under the Water Framework Directive, the EIA Directive and the Habitats and Birds Directives, I ask the Commission to refuse permission.

Declaration:

I declare that the information contained in this submission is true and accurate to the best of my knowledge and belief.

Signature:



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Date: 19 June 2026