

Observation of Maureen Nolan

Response to Applicant's Responses to Third-Party Observations

An Coimisiún Pleanála

ACP Ref. 323761 – Cooloo Wind Farm

Introduction

I respectfully submit this observation in response to the applicant's replies to third-party submissions. The responses do not resolve the key environmental uncertainties previously identified. Instead, they rely on mitigation, monitoring and future management rather than demonstrating that significant adverse environmental effects can be excluded before consent is granted, contrary to the precautionary principle underpinning EU environmental law.

Biodiversity

The proposal would result in permanent habitat loss, fragmentation and hydrological change within a sensitive peatland landscape. Replacement planting cannot replicate the ecological function of mature hedgerows or established peatland habitats within any meaningful timeframe. Historic disturbance does not justify further deterioration of these habitats.

Protected Birds, Bats, Butterflies, Flora and Fauna

The applicant has not demonstrated that protected birds, bats, butterflies, flora and fauna will remain unaffected. Habitat fragmentation, altered hydrology and loss of ecological corridors create continuing uncertainty for protected species. Reliance on future monitoring is not a substitute for demonstrating that impacts have been avoided.

Hydrology, Hydrogeology and the Floating Road

I object to the proposed floating road because its construction requires peat excavation, drainage works and permanent alteration of the peatland hydrological regime. If the development cannot proceed without significant disturbance of peatland habitats, the floating road should be removed from the proposal. Otherwise, permission should be refused.

Peatland Assessment

The applicant places undue emphasis on historical peat cutting to reduce the importance of the affected peatland. Previously disturbed peatlands continue to perform valuable ecological, hydrological and carbon storage functions and may recover if protected. This proposal would instead introduce further irreversible disturbance.

Consultant Evidence

I note that MKO and HES were involved in environmental assessment work associated with the Meenbog Wind Farm, where a significant peat slide occurred during construction. While

that event is not determinative of this application, it demonstrates that predictive assessments and proposed mitigation may not always reflect actual environmental outcomes. The Board should therefore scrutinise these conclusions with particular care.

Wind Turbine Spacing

The applicant accepts departures from recognised national turbine spacing guidance but has not provided sufficiently compelling evidence that these departures will not increase environmental impacts over the lifetime of the development.

Conclusion

For these reasons, I consider that the proposal does not satisfy Article 6 of the Habitats Directive, the Environmental Impact Assessment Directive or the precautionary principle under Article 191 TFEU. Significant uncertainty remains and I respectfully request that An Coimisiún Pleanála refuse permission for the proposed Cooloo Wind Farm (ACP Ref. 323761).

Yours faithfully,

Maureen Nolan
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