

Submission to An Coimisiún Pleanála

Response to the Applicant's February 2026

Response to Third Party Submissions

Planning Application:	Cooloo Wind Farm
ACP Reference	ACP-323761-25
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Date:	9 th July 2026

Personal Statement

I make this submission as a resident living in the immediate vicinity of the proposed Cooloo Wind Farm development and as a person who will be directly and personally affected by the outcome of this planning application.

My wife, **Agnes**, and I have made our home in Lissavally, Barnaderg, where we are raising our four-year-old daughter. Our family home is located less than 200 metres from the proposed construction entrance on the R332, and our household receives its drinking water from the Barnaderg Gortbeg Group Water Scheme. Consequently, I have a direct and legitimate planning interest in the potential effects of the proposed development on my family's residential amenity, health and wellbeing, road safety, drinking water supply and the wider rural environment in which we live.

Our home is at the centre of our family life. As parents of a young four-year-old daughter, much of our daily routine revolves around our home and the surrounding local road network. We rely on the R332 every day for school journeys, work, shopping, healthcare, family visits and community activities. The peace, safety and rural character of our home and its surroundings are therefore of great importance to us and form an important part of the environment in which our daughter is growing up.

Our home is also a place where our extended family regularly gathers. My elderly mother-in-law visits frequently and spends considerable time with our family. We are also regularly visited by my young niece, who is on the autism spectrum. She particularly benefits from familiar surroundings, routine and a calm environment when visiting our home. While I do not suggest that these personal circumstances create any additional planning entitlement, they help to explain why the quality, safety and tranquillity of our home environment are especially important to our family and why the potential effects of prolonged construction activity, increased Heavy Goods Vehicle (HGV) movements, abnormal load deliveries, construction noise and other associated impacts are matters of genuine concern.

In preparing this submission, I have carefully reviewed the planning application, the Environmental Impact Assessment Report (EIAR), the Natura Impact Statement (NIS), the Additional Information submitted by the Applicant, the observations made by Galway County

Council, prescribed bodies and members of the public, together with the Applicant's February 2026 Response to Third Party Submissions.

This submission is not intended to repeat the observations that I made during the original planning process. Rather, it considers whether the Applicant's response and supporting documentation have materially addressed the issues raised throughout the consultation process and whether the additional information now before An Coimisiún Pleanála provides a sufficiently complete, objective and scientifically robust evidential basis upon which the Commission can determine the application.

I fully recognise the importance of renewable energy development in helping Ireland achieve its climate, energy security and decarbonisation objectives. My submission should not be interpreted as opposition to renewable energy development as a matter of principle. Rather, I respectfully submit that renewable energy projects must also satisfy the statutory requirements of proper planning and sustainable development, be supported by comprehensive environmental assessment, and demonstrate that likely significant environmental effects can be avoided, mitigated or appropriately managed.

Throughout this submission, I have sought to adopt a balanced, objective and evidence-based approach. Where appropriate, I acknowledge the considerable work undertaken by the Applicant and the extensive additional information submitted during the course of the application. However, I also identify a number of matters which, in my respectful opinion, continue to warrant careful consideration before a final determination is made.

Throughout this submission, I have sought to adopt a balanced, objective and evidence-based approach. Where appropriate, I acknowledge the considerable work undertaken by the Applicant and the extensive additional information submitted during the course of the application. However, I also identify a number of matters which, in my respectful opinion, continue to warrant careful consideration before a final determination is made.

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Executive Summary

This submission is made in response to the invitation issued by **An Coimisiún Pleanála** inviting observations on the Applicant's February 2026 responses to third-party submissions and to the report of Galway County Council in respect of the proposed Cooloo Wind Farm.

The purpose of this submission is not to revisit every issue previously raised during the planning process. Rather, it examines whether the Applicant's February 2026 responses have materially addressed the substantive planning, environmental and technical concerns identified by Galway County Council, prescribed bodies and third-party observers.

Having reviewed the Applicant's responses alongside the original planning application, the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Planning Report and associated technical documentation, it is respectfully submitted that the Applicant has **not materially strengthened the evidential basis** upon which this application falls to be determined.

While the Applicant repeatedly states that concerns have already been addressed within the original application documentation, the February 2026 responses largely reiterate conclusions previously reached rather than providing significant new evidence capable of resolving the outstanding issues identified during the statutory consultation process. In many instances, the responses rely upon cross-reference to existing reports, reaffirm previously stated conclusions, or indicate that important matters will be addressed during detailed design, construction or post-consent monitoring.

This distinction is important. The Commission's task is not to determine whether the Applicant has produced a comprehensive body of documentation, but whether the information before it is sufficient to enable a lawful Environmental Impact Assessment and Appropriate Assessment and to conclude that the proposed development represents proper planning and sustainable development.

Throughout the Applicant's responses, a number of recurring themes emerge:

- reliance upon the original EIAR and Planning Report in place of additional objective evidence;

- reliance upon mitigation measures and construction-stage management to address matters of environmental concern;
- deferral of important technical detail until after the grant of planning permission;
- limited engagement with the specific concerns raised by Galway County Council and third-party observers; and
- repeated policy assertions that are not always accompanied by additional supporting analysis.

Although many of the Applicant's responses provide useful clarification of the original application, clarification should not be confused with the provision of additional evidence. Where scientific uncertainty remains regarding matters such as hydrology, peat stability, ecology, residential amenity or cumulative environmental effects, the Commission must satisfy itself that such uncertainty has been reduced to an acceptable level before development consent is granted.

Particular attention is drawn within this submission to several matters that remain central to the Commission's determination, including:

- compliance with the Galway County Development Plan and the Local Area Renewable Energy Strategy (LARES), particularly in relation to lands identified as "Generally to be Discouraged" for wind energy development;
- the relationship between the proposed wind farm, the associated electrical infrastructure, the proposed Battery Energy Storage System (BESS) and the grid connection, and whether the assessment of these elements provides sufficient certainty for decision-making;
- remaining uncertainty relating to peat, groundwater, hydrology and the protection of water resources;
- the adequacy of ecological assessment, including cumulative effects and the certainty of proposed mitigation measures;
- the cumulative effects of the proposed development on residential amenity, including landscape, visual impact, noise, shadow flicker and the overall living environment experienced by nearby residents;
- the adequacy of traffic assessment, particularly having regard to survey methodology, abnormal load movements and the effects of prolonged construction activity on local communities; and

- the extent to which the Applicant's responses meaningfully address the detailed observations submitted by Galway County Council and third parties.

The Applicant bears the burden of demonstrating that the proposed development complies with the requirements of the Planning and Development Act, the applicable Development Plan, European environmental law and the principles of proper planning and sustainable development. That burden is not discharged simply by repeating earlier conclusions or expressing confidence in the original assessment.

Ultimately, it is for An Coimisiún Pleanála, as the competent authority, to determine whether the information before it is sufficient to support a lawful decision. Where reasonable scientific uncertainty remains, or where reliance is placed upon future investigation or post-consent mitigation to resolve matters fundamental to the environmental assessment, the Commission should exercise particular caution.

For the reasons set out in the chapters that follow, it is respectfully submitted that the Applicant's February 2026 responses have not materially resolved a number of significant planning and environmental issues that remain relevant to the Commission's assessment. Those issues should therefore continue to attract careful consideration when determining whether the proposed development satisfies the requirements of proper planning and sustainable development.

1. Introduction

This submission is made in response to the invitation issued by **An Coimisiún Pleanála** dated 5 June 2026, inviting observations on the Applicant's February 2026 responses to third-party submissions and to the report of Galway County Council in respect of the proposed Cooloo Wind Farm.

The Commission's invitation provides an important opportunity for interested parties to comment on whether the Applicant's responses have materially addressed the planning, environmental and technical issues raised during the statutory consultation process. This submission has been prepared in that context.

It is important to emphasise that the purpose of this submission is not to repeat the original observations made on the planning application. Those submissions remain before the Commission and should continue to be considered in their entirety. Rather, this document examines whether the Applicant's subsequent responses provide sufficient additional information to address the concerns identified by Galway County Council, prescribed bodies and third-party observers.

Having reviewed the Applicant's February 2026 responses alongside the original planning application documentation, it is respectfully submitted that many of the outstanding issues remain unresolved. While the Applicant has provided detailed commentary on a wide range of matters, the responses frequently rely upon references to the original Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Planning Report and associated technical documents without materially expanding the evidence available to the Commission. Throughout the responses, there is a recurring distinction between explanation and evidence. In many instances, the Applicant explains why it considers the original assessment to remain valid. However, where substantive concerns have been raised by the Planning Authority, statutory consultees or members of the public, explanation alone does not necessarily provide the additional objective evidence required to resolve those concerns.

The Commission is therefore respectfully requested to consider not only whether the Applicant has responded to the issues raised, but whether those responses materially strengthen the evidential basis of the application. The preparation of extensive documentation does not of itself demonstrate compliance with the requirements of proper planning and sustainable development. Rather, the Commission must independently assess whether the information before it is sufficient to enable a lawful Environmental Impact Assessment, Appropriate Assessment and informed planning decision.

This submission is intended to assist the Commission in that assessment by identifying those areas where uncertainty remains and where further scrutiny may be warranted before a determination is made.

2. Scope of this Submission

2.1 Relationship to Previous Submission

This submission supplements, and should be read in conjunction with, my original submission on the proposed **Cooloo Wind Farm** planning application. Except where expressly stated, nothing contained within this document should be interpreted as withdrawing, replacing or modifying the observations previously made. Rather, this submission builds upon those observations by responding specifically to the additional information submitted by the Applicant during the course of the application.

2.2 Scope of this Submission

This submission has been prepared in response to the **Applicant's February 2026 Response to Third Party Submissions** and the accompanying Additional Information submitted in respect of the proposed **Cooloo Wind Farm** development.

The purpose of this document is not to repeat the observations made during the original statutory consultation process. Instead, it considers whether the Applicant's response and supporting documentation have **materially addressed** the planning, environmental and technical issues raised by Galway County Council, prescribed bodies, members of the public and other interested parties during the course of the application.

In preparing this submission, I have undertaken a detailed review of:

- the planning application documentation;
- the Environmental Impact Assessment Report (EIAR);
- the Natura Impact Statement (NIS);
- the Applicant's Additional Information;
- the Applicant's February 2026 Response to Third Party Submissions;
- the observations submitted by Galway County Council, prescribed bodies and members of the public;
- relevant national planning policy, environmental guidance and applicable legislative requirements; and
- the documentation placed before An Coimisiún Pleanála throughout the planning process.

I recognise and acknowledge the considerable work undertaken by the Applicant in preparing the original planning application and the extensive additional information submitted in response to observations received during the statutory consultation process. The Applicant's February 2026 Response provides significant additional technical information and clarification across a broad range of environmental disciplines.

However, the purpose of this submission is not simply to consider whether the Applicant continues to support the conclusions reached within the original planning application. Rather, it is to assist **An Coimisiún Pleanála** in determining whether the additional information now before it materially addresses the issues raised during the planning process and provides a sufficiently complete, objective and scientifically robust evidential basis upon which the Commission can carry out its own independent assessment and determine the application.

This submission is organised into thematic chapters addressing the principal planning and environmental issues arising from the proposed development, including:

- Planning Process and Public Participation;
- Planning Policy and the Statutory Planning Context;
- Landscape and Visual Impact;
- Cultural Heritage and Archaeology;
- Hydrology and Hydrogeology;
- Environmental Impact Assessment and Appropriate Assessment;
- Residential Amenity, Human Health and Quality of Life;
- Traffic, Transportation and Road Safety;
- Biodiversity, Ecology and Nature Conservation;
- Climate, Carbon Balance and Sustainable Development; and
- Planning Policy, Sustainable Development and the Overall Planning Balance.

Each chapter adopts a consistent approach by:

- summarising the relevant aspects of the Applicant's February 2026 Response;
- acknowledging the additional information and clarification provided by the Applicant;
- considering whether that information materially alters or strengthens the conclusions presented in the original planning application;
- identifying matters which, in my respectful opinion, continue to warrant careful consideration by the Commission; and

- requesting that An Coimisiún Pleanála consider those matters when undertaking its Environmental Impact Assessment, Appropriate Assessment and overall determination of the application.

Throughout this submission, I have sought to present my observations in a balanced, objective and evidence-based manner. Where I agree that the Applicant has satisfactorily addressed an issue, I have acknowledged this. Where concerns remain, I have endeavoured to explain why I believe those matters continue to be relevant to the Commission's assessment.

This submission is made respectfully and in good faith, with full recognition of the importance of renewable energy development in helping Ireland achieve its climate and energy objectives. Equally, I respectfully submit that renewable energy developments must also satisfy the statutory requirements of **proper planning and sustainable development**, demonstrate that likely significant environmental effects have been comprehensively assessed, and ensure that the interests of local communities and the environment are appropriately protected.

Accordingly, the observations that follow are intended solely to assist **An Coimisiún Pleanála** in carrying out its independent statutory functions and in determining whether the proposed Cooloo Wind Farm development complies with the requirements of Irish and European planning and environmental law.

Accordingly, the chapters that follow identify those matters that, in the opinion of the author of this submission, remain unresolved and continue to require careful consideration before a determination is made on the application.

3. The Burden of Proof Remains with the Applicant

A consistent theme throughout the Applicant's February 2026 responses is the assertion that the matters raised by Galway County Council, prescribed bodies and third-party observers have already been addressed within the original planning application documentation, including the

Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS), Planning Report and supporting technical assessments.

While it is entirely appropriate for an applicant to refer back to material previously submitted, cross-reference alone does not necessarily resolve substantive concerns raised during the planning process. Where detailed observations have identified potential deficiencies, uncertainties or conflicting interpretations of the available evidence, the Commission must consider whether the Applicant's subsequent responses materially strengthen the evidential basis of the application or merely reaffirm conclusions already expressed.

The distinction between explanation and evidence is fundamental. Throughout the responses, the Applicant frequently explains why it considers the original assessments to remain robust. However, the provision of an explanation does not automatically constitute new objective evidence. The central question for the Commission is not whether the Applicant maintains confidence in its original conclusions, but whether the information now before the Commission is sufficient to enable a lawful and fully informed determination.

Under the Planning and Development Act and the relevant European environmental legislation, the burden of demonstrating that a proposed development complies with the requirements of proper planning and sustainable development rests with the Applicant. That responsibility includes providing sufficient objective information to enable the Commission to undertake its own independent Environmental Impact Assessment and, where required, Appropriate Assessment.

Accordingly, where significant concerns have been raised by the Planning Authority, statutory consultees or members of the public, it is not sufficient simply to state that the issue has already been assessed or that the original methodology remains appropriate. Rather, the Applicant should demonstrate, by reference to objective evidence, why those concerns do not alter the conclusions previously reached.

Having reviewed the February 2026 responses, it is respectfully submitted that many of the responses rely upon one or more of the following approaches:

- referring the reader back to the original EIAR, Planning Report or supporting technical documents;

- restating the conclusions previously reached by the Applicant's consultants;
- asserting that recognised methodologies have been followed without addressing the specific criticisms raised;
- relying upon proposed mitigation measures to demonstrate environmental acceptability;
- indicating that additional detail will be developed during detailed design, construction or post-consent monitoring.

Each of these approaches may, in appropriate circumstances, contribute to a planning assessment. However, none of them should be regarded as automatically resolving concerns that have been raised by the Planning Authority or other participants in the statutory process. The Commission must instead consider whether the cumulative body of information now before it provides sufficient certainty to support a lawful planning decision.

Particular caution should be exercised where important aspects of the assessment remain dependent upon future investigations, detailed design or construction-stage monitoring. Such measures undoubtedly form part of modern infrastructure delivery and can provide valuable environmental safeguards. Nevertheless, they should not be relied upon to establish baseline environmental conditions or to resolve matters that are fundamental to the assessment of likely significant effects. The Commission should distinguish between mitigation measures that manage an identified impact and investigations that are intended to determine whether an impact exists in the first instance.

The Applicant's responses also place considerable emphasis on compliance with published guidance, recognised methodologies and established assessment procedures. While adherence to accepted professional guidance is an important consideration, compliance with methodology should not be treated as an end in itself. The Commission's statutory function is to determine whether the evidence produced through those methodologies demonstrates that the proposed development satisfies the requirements of proper planning and sustainable development.

Ultimately, the Commission must reach its own conclusions. It is not required to accept the Applicant's interpretation of the evidence simply because that interpretation has been consistently maintained throughout the application process. The Commission must independently evaluate the adequacy, reliability and completeness of the information before it

and determine whether any remaining uncertainty is compatible with the grant of development consent.

This principle is particularly important in relation to matters involving environmental protection, where the Commission must be satisfied that the information available is sufficiently complete to enable both a lawful Environmental Impact Assessment and, where applicable, an Appropriate Assessment. Where reasonable scientific uncertainty persists regarding matters such as hydrology, peat stability, ecology or cumulative environmental effects, the Commission should ensure that such uncertainty has been satisfactorily resolved before determining the application.

3.1 Matters Remaining for the Commission's Determination

In light of the foregoing, the Commission is respectfully requested to consider the following questions:

- Have the Applicant's February 2026 responses materially expanded the evidential basis of the application, or do they primarily reaffirm conclusions already contained within the original planning documentation?
- Where concerns have been raised by Galway County Council, prescribed bodies or third-party observers, has the Applicant provided sufficient objective evidence to address those concerns?
- Does reliance upon construction-stage investigations, detailed design and post-consent monitoring indicate that aspects of the environmental assessment remain uncertain at the time of determination?
- Can the Commission be satisfied that the Applicant has discharged the burden of demonstrating that the proposed development complies with the requirements of proper planning and sustainable development?
- Is the information currently before the Commission sufficient to enable a lawful Environmental Impact Assessment and Appropriate Assessment, or do the remaining uncertainties require further consideration before a decision is made?

4. Planning Policy and the Statutory Planning Balance

4.1 Introduction

The Applicant's February 2026 responses place considerable reliance on national and local planning policy in support of the proposed development. In particular, the Applicant submits that the proposal is consistent with national renewable energy objectives, accords with the Galway County Development Plan 2022–2028 and complies with the Local Area Renewable Energy Strategy (LARES).

The importance of renewable energy development in meeting Ireland's climate action and energy security objectives is fully recognised. National policy clearly supports the expansion of renewable electricity generation and encourages the delivery of appropriately sited renewable energy projects.

However, the existence of strong national policy support for renewable energy does not remove the requirement for each individual proposal to be assessed on its own planning and environmental merits. The Commission's statutory responsibility extends beyond determining whether a proposal contributes to renewable energy targets. It must also determine whether the development complies with the Development Plan, protects the receiving environment and represents proper planning and sustainable development having regard to all relevant considerations.

The purpose of this chapter is therefore not to question the importance of renewable energy policy, but to consider whether the Applicant has demonstrated that this particular proposal satisfies the planning policy framework applicable to the site and has adequately addressed the concerns identified by Galway County Council, prescribed bodies and third-party observers.

4.2 The Statutory Planning Framework

The determination of this application must be made within the statutory framework established by the Planning and Development Act and the planning policy hierarchy applicable to County Galway.

In undertaking its assessment, the Commission is required to have regard, amongst other matters, to:

- the provisions of the Galway County Development Plan 2022–2028;
- the Local Area Renewable Energy Strategy (LARES);
- relevant national planning and climate policy;
- the likely significant effects of the proposed development on the environment;
- the protection of residential amenity;
- landscape character;
- biodiversity and ecological integrity;
- water resources and hydrology; and
- the overall objective of securing proper planning and sustainable development.

These considerations must be evaluated collectively. No individual policy objective should be considered in isolation or treated as automatically overriding the remainder of the statutory planning framework.

While renewable energy policy is an important element of that framework, it forms one component of the overall planning balance that the Commission is required to undertake. Equally important are the policies intended to safeguard environmental quality, protect sensitive landscapes, conserve biodiversity and maintain the amenities of existing communities.

Accordingly, the Commission's assessment must consider not only the public benefits associated with renewable energy generation, but also whether the Applicant has demonstrated that the proposed development can be accommodated at this location without giving rise to unacceptable planning or environmental consequences.

4.3 The Galway County Development Plan and the Local Area Renewable Energy Strategy (LARES)

The Applicant submits that the proposed development accords with the Galway County Development Plan and with the Local Area Renewable Energy Strategy. In doing so, considerable emphasis is placed on the proposition that lands identified as "Generally to be Discouraged" are not subject to an absolute prohibition on wind energy development and that proposals within such areas should instead be considered on their individual merits.

It is accepted that the LARES does not impose a blanket prohibition on development within these areas. The designation is not equivalent to a zoning objective that excludes development entirely. Nevertheless, it would be incorrect to treat the designation as carrying little or no planning significance.

The LARES forms part of the strategic planning framework adopted by Galway County Council to guide the spatial distribution of wind energy development across the county. It represents a considered planning judgement, informed by environmental, landscape, ecological, hydrological and residential considerations, as to the relative suitability of different locations for wind energy development.

The identification of lands as "Generally to be Discouraged" therefore reflects a deliberate policy choice that such areas possess characteristics which generally make them less suitable for wind energy development than lands identified as preferred or open for consideration. While development may still be capable of being permitted in such locations, the designation clearly indicates that a higher level of planning justification is required.

The Commission is therefore respectfully requested to attach appropriate weight to the spatial strategy adopted within the Development Plan. To conclude otherwise would risk reducing the LARES mapping exercise to little more than advisory guidance, notwithstanding its role within the statutory planning framework.

4.4 Development within "Generally to be Discouraged" Areas

The Applicant's February 2026 responses repeatedly state that the proposed development should be assessed on its individual merits and that the existence of a "Generally to be Discouraged" designation does not preclude the grant of planning permission.

That proposition is not disputed. However, it does not answer the more fundamental planning question that arises in this case.

The issue before the Commission is not whether development is legally permissible within lands identified as "Generally to be Discouraged". Rather, the issue is whether the Applicant has demonstrated, through robust site-specific evidence, that the characteristics which led to that designation have been adequately addressed and that the proposal nevertheless represents proper planning and sustainable development.

The burden of providing that justification rests with the Applicant. It is not sufficient merely to observe that the Development Plan allows for planning applications to be considered within these areas. The Applicant must also demonstrate why this particular proposal should be regarded as an appropriate exception to the general spatial strategy established by the Development Plan.

Having reviewed the February 2026 responses, it is respectfully submitted that the Applicant largely reiterates the conclusions contained within the original Planning Report rather than providing materially new planning evidence to justify development within a policy area that the Development Plan identifies as generally unsuitable for wind energy development.

The Commission should therefore carefully distinguish between the absence of an absolute prohibition and the positive demonstration of planning acceptability. These are separate considerations. The fact that development is not expressly prohibited does not, of itself, establish compliance with the broader objectives of the Development Plan or demonstrate that the proposal achieves the proper planning and sustainable development of the area.

The Applicant argues that the principle of the proposed wind farm is acceptable notwithstanding that elements of the development are located within lands designated as **"Generally to be Discouraged"** for wind energy development under the Galway County Development Plan 2022–2028 and the Local Area Renewable Energy Strategy (LARES). The Applicant relies heavily on the proposition that development in such areas is not expressly prohibited and should instead be assessed on its individual merits.

While it is accepted that the LARES does not impose an absolute prohibition, this interpretation significantly understates the purpose of the zoning framework adopted by the elected members of Galway County Council.

The designation "Generally to be Discouraged" is not merely advisory. It reflects a strategic planning judgement that these lands possess characteristics which make them generally unsuitable for wind energy development unless exceptional justification can be demonstrated. The burden therefore rests firmly on the Applicant to demonstrate why development in these areas is appropriate notwithstanding the identified policy constraints.

The February 2026 response does not provide that justification. Instead, it largely repeats the assessment contained within the original Planning Report and asserts that the project should be assessed on its merits. That assertion does not answer the central planning question before the Commission.

4.5 Renewable Energy Policy and the Planning Balance

The Applicant places significant emphasis on national policy objectives supporting the accelerated deployment of renewable energy infrastructure. These objectives are an important component of the planning framework and reflect Ireland's commitments in relation to climate action, energy security and the transition to a low-carbon economy.

The importance of these objectives is not disputed. Indeed, there is a clear public interest in facilitating appropriately located renewable energy developments capable of contributing to national and regional energy targets.

However, national policy does not establish a presumption in favour of every renewable energy proposal irrespective of its location or potential environmental effects. Rather, it requires that renewable energy projects be planned and delivered in a manner that is consistent with the principles of sustainable development and with the statutory planning framework.

Accordingly, the Commission's assessment must involve a balanced consideration of all relevant planning matters. Renewable energy benefits must be weighed alongside potential

impacts on landscape character, residential amenity, biodiversity, water resources, cultural heritage, traffic, public safety and other environmental considerations identified through the planning process.

This balancing exercise lies at the heart of the Commission's statutory function. It follows that compliance with national renewable energy policy cannot, in itself, determine the outcome of the application. Instead, the Commission must consider whether the Applicant has demonstrated that the environmental and planning impacts identified throughout the application have been satisfactorily avoided, minimised or mitigated and that any remaining effects are acceptable in the context of the Development Plan and the proper planning and sustainable development of the area.

4.6 The Weight to be Attached to Galway County Council's Observations

The report prepared by Galway County Council forms an important part of the material before the Commission. As the Planning Authority for the area, the Council's assessment reflects its detailed consideration of the proposed development against the policies and objectives of the Development Plan together with the environmental characteristics of the receiving environment.

The Applicant's February 2026 responses refer to elements of the Council's report that acknowledge the strategic importance of renewable energy and the potential acceptability of wind energy development in principle within the wider area.

Those observations are relevant. However, they should be considered alongside the Council's detailed comments regarding the environmental assessment, technical information and planning issues that remained unresolved at the time its report was prepared.

The Planning Authority did not simply conclude that the proposal should proceed because it would contribute to renewable energy generation. Rather, its report identified a range of matters requiring careful examination by the Commission before it could be satisfied that the proposal complied with the requirements of proper planning and sustainable development.

The Applicant's responses address many of those matters. However, in numerous instances the responses rely principally upon the conclusions already contained within the original application documentation. The Commission should therefore independently consider whether those responses materially resolve the Planning Authority's concerns or whether they primarily explain why the Applicant continues to disagree with them.

The Planning Authority's report should therefore be read as a whole. Selective reliance upon favourable passages should not diminish the significance of those sections that identify outstanding planning or environmental issues.

4.7 Reliance on County-wide Renewable Energy Targets

The Applicant also argues that the delivery of renewable energy targets for County Galway requires consideration of projects located within areas that are not identified as the most favourable locations for wind energy development.

While future renewable energy requirements are clearly relevant to strategic planning, they should not be treated as a substitute for a site-specific assessment of environmental suitability. The purpose of the Local Area Renewable Energy Strategy is to guide renewable energy development towards locations considered most appropriate having regard to a wide range of planning and environmental constraints. The existence of ambitious renewable energy targets does not diminish the importance of that strategy, nor does it automatically justify development within locations where greater sensitivities have been identified.

Each planning application must therefore stand on its own merits. The Commission is respectfully requested to consider whether the Applicant has demonstrated that this particular site is suitable for the proposed development, rather than relying primarily upon broader strategic arguments concerning county-wide generating capacity.

4.8 Policy Assertions Must Be Supported by Evidence

A recurring feature of the Applicant's February 2026 responses is the statement that the proposal:

- complies with the Galway County Development Plan;
- accords with the Local Area Renewable Energy Strategy;

- is consistent with national renewable energy policy; and
- represents proper planning and sustainable development.

These statements express the Applicant's planning conclusions. They do not, of themselves, establish that those conclusions are correct.

The Commission's role is to examine the evidence upon which those conclusions depend. Where compliance with planning policy relies upon technical assessments relating to hydrology, peat, ecology, landscape, residential amenity or cumulative environmental effects, the robustness of those assessments becomes central to the policy analysis.

If uncertainty remains in relation to those underlying assessments, the weight that can properly be attached to the Applicant's policy conclusions is correspondingly reduced.

Accordingly, planning policy should not be considered in isolation from the technical evidence presented elsewhere within the application. The Applicant's conclusion that the proposal complies with planning policy is ultimately dependent upon whether the supporting environmental assessments provide a sufficiently reliable and comprehensive basis for that conclusion.

4.9 Matters Remaining for the Commission's Determination

In light of the foregoing, the Commission is respectfully requested to consider the following matters:

- Has the Applicant demonstrated, through robust site-specific evidence, that the proposed development complies with the Galway County Development Plan and the Local Area Renewable Energy Strategy?
- Has sufficient justification been provided for development within lands identified as "Generally to be Discouraged" for wind energy development?
- Has appropriate weight been given to all aspects of Galway County Council's report, including those identifying outstanding planning and environmental concerns?
- Does reliance on national and county-wide renewable energy objectives appropriately reflect the statutory requirement to assess the proposal on its individual planning merits?

- Are the Applicant's conclusions regarding policy compliance fully supported by the underlying technical evidence?
- Having regard to the application as a whole, can the Commission be satisfied that the proposed development represents proper planning and sustainable development?

5. Project Splitting and the Assessment of Associated Infrastructure

5.1 Introduction

One of the principal issues raised by third-party observers throughout the statutory consultation process concerns the relationship between the proposed wind farm, the associated electrical infrastructure, the proposed Battery Energy Storage System (BESS) and the grid connection.

In its February 2026 responses, the Applicant maintains that the planning application currently before the Commission relates only to the proposed wind farm and associated onsite infrastructure, while the onsite substation, BESS and the 110 kV grid connection will be progressed through a separate planning application. At the same time, the Applicant confirms that these elements have been considered collectively within the Environmental Impact Assessment Report (EIAR) as part of the wider "Proposed Project".

This distinction is central to the Commission's assessment. The issue is not whether separate planning applications are legally permissible. Rather, it is whether the environmental assessment and the proposed consent strategy provide sufficient certainty to enable the Commission to undertake a complete and informed assessment of the overall development.

The Commission must therefore consider whether the separation of the consent process has any implications for the completeness of the environmental assessment, the assessment of cumulative effects or the proper understanding of the development that is ultimately intended to be constructed and operated.

5.2 The Relationship Between the Wind Farm and the Associated Infrastructure

The Applicant distinguishes between the "Proposed Wind Farm", which forms the subject of the present planning application, and the wider "Proposed Project", which also includes the onsite electrical substation, the proposed Battery Energy Storage System and the underground grid connection.

This distinction is recognised within the application documentation itself. However, it is equally clear that these components are not independent developments. Rather, they form interconnected elements of a single renewable energy project intended to generate electricity and export that electricity to the national transmission network.

The practical operation of the wind farm depends upon the availability of suitable electrical infrastructure capable of receiving, controlling and transmitting the electricity generated by the turbines. Without that infrastructure, the proposed wind farm would be incapable of performing its intended function.

Accordingly, while separate planning applications may ultimately be used to obtain development consent for different components, those components remain functionally interdependent and should be considered within that context when assessing the adequacy of the environmental information before the Commission.

5.3 Functional Dependence

The Applicant's responses acknowledge that the electrical infrastructure forms part of the wider project assessed within the EIAR. This acknowledgement is significant.

It recognises that the environmental effects of the proposed wind farm cannot be fully understood in isolation from the infrastructure required to enable its operation.

The onsite substation, underground grid connection and any associated energy storage infrastructure are not ancillary developments in the ordinary sense. They are operationally essential components of the overall project.

The Commission should therefore consider whether the environmental assessment presented adequately reflects this functional dependence and whether the information currently before it provides sufficient certainty regarding the overall development that is proposed.

This submission does not contend that every operational component must necessarily be authorised under a single planning application. However, where separate consent procedures are proposed for infrastructure that is fundamental to the operation of the project, it is important that there is no uncertainty regarding the cumulative environmental consequences of that approach.

5.4 Environmental Assessment and Development Consent

The Applicant submits that the wider project has been assessed within the EIAR notwithstanding that only part of that project currently forms the subject of the application before the Commission.

The inclusion of associated infrastructure within the environmental assessment is welcomed insofar as it recognises that the proposed wind farm should not be considered in isolation. However, the Commission should distinguish between the scope of the environmental assessment and the scope of the development consent presently sought.

Where environmental conclusions are based upon assumptions regarding infrastructure that will be subject to future design development or separate planning applications, it is appropriate for the Commission to consider whether those assumptions are sufficiently certain to support the assessment currently before it.

The Applicant's responses do not fully explain how the conclusions presented within the EIAR would be affected should subsequent design refinement, engineering requirements or planning decisions result in material changes to the associated electrical infrastructure.

The Commission should therefore satisfy itself that the environmental assessment remains sufficiently robust notwithstanding the proposed separation of the consent process.

5.5 Reliance on Future Consent Procedures

A recurring feature of the Applicant's responses is the statement that detailed consideration of the electrical infrastructure will occur through future planning applications. While this may represent an appropriate procedural mechanism, it does not in itself address the planning question currently before the Commission.

The Commission must determine whether sufficient information is presently available to understand the likely environmental effects of the complete project and to assess those effects in accordance with the requirements of the Planning and Development Act and the Environmental Impact Assessment Directive.

The existence of future consent procedures should not reduce the level of certainty required at the present stage regarding matters that are fundamental to the environmental assessment of the project.

Where future applications have the potential to influence construction methodologies, traffic movements, ecological mitigation, hydrological protection measures or operational arrangements, the Commission should consider whether the cumulative implications of those future decisions have been adequately addressed within the current assessment.

5.6 Cumulative Environmental Assessment

The Applicant repeatedly states that the wider project has been assessed on a cumulative basis. This is an important aspect of the application and reflects the fact that the proposed development extends beyond the wind turbines themselves.

Nevertheless, cumulative assessment requires more than identifying associated infrastructure. It also requires sufficient certainty regarding the nature, scale and implementation of that infrastructure to enable meaningful assessment of cumulative environmental effects.

Should future applications introduce material alterations to the location, design or construction of associated infrastructure, the assumptions upon which aspects of the current assessment are based may also require reconsideration.

The Commission should therefore be satisfied that the cumulative assessment presented within the EIAR is sufficiently robust to accommodate the proposed approach to future development consent.

5.7 The Need for Consistency Between Assessment and Consent

An underlying principle of environmental assessment is that the development being assessed should correspond with the development that is ultimately authorised.

Where different components of an integrated project are advanced through separate consent procedures, particular care should be taken to ensure that there is no inconsistency between the environmental assumptions relied upon during assessment and the infrastructure that is ultimately delivered.

The Applicant's responses provide reassurance that associated infrastructure has been considered within the EIAR. However, they provide comparatively limited explanation of how consistency between the current assessment and future consent procedures will be maintained should modifications become necessary during detailed project development.

The Commission should therefore consider whether sufficient certainty presently exists regarding the configuration of the complete project.

5.8 Conclusion

The purpose of this chapter is not to suggest that separate planning applications are inherently inappropriate or that associated infrastructure must necessarily be authorised under a single development consent.

Rather, the issue is whether the environmental assessment currently before the Commission provides sufficient certainty regarding all operationally essential components of the proposed project.

Having reviewed the Applicant's February 2026 responses, it is respectfully submitted that they explain the proposed consent strategy but do not materially strengthen the evidential basis upon

which the Commission must determine whether the environmental effects of the complete project have been fully assessed.

Where uncertainty remains regarding infrastructure that is integral to the operation of the proposed wind farm, the Commission should carefully consider whether that uncertainty has been satisfactorily addressed before reaching a determination.

5.9 Matters Remaining for the Commission's Determination

The Commission is respectfully requested to consider the following matters:

- Whether the proposed separation of the wind farm, onsite substation, Battery Energy Storage System and grid connection into separate consent procedures has any implications for the completeness of the environmental assessment.
- Whether sufficient certainty exists regarding the design and implementation of the infrastructure required for the operation of the proposed wind farm.
- Whether the cumulative environmental effects of the complete project have been fully assessed having regard to the proposed consent strategy.
- Whether future planning applications could introduce changes that materially affect assumptions relied upon within the current Environmental Impact Assessment.
- Whether the information presently before the Commission provides a sufficiently complete basis upon which to determine the application in accordance with the requirements of proper planning and sustainable development.

6. Public Consultation and Procedural Fairness

6.1 Introduction

Public consultation is an important element of the planning process for Strategic Infrastructure Development. It provides an opportunity for local communities to understand a proposed development, identify issues of concern and contribute meaningfully to the evolution of a project before a planning decision is made.

In its February 2026 response, the Applicant outlines an extensive programme of public consultation including public information events, newsletters, project websites, meetings with stakeholders and statutory notices. The Applicant concludes that the consultation undertaken was comprehensive and that it provided meaningful opportunities for engagement throughout the development of the proposed Cooloo Wind Farm.

I acknowledge that a programme of consultation was undertaken and that the Applicant has provided additional explanation of those activities.

However, as a resident of the local area who will be directly affected by the proposed development, I do not believe that the Applicant's response materially addresses many of the concerns raised by local residents regarding the effectiveness of that consultation. In my view, the issue is not whether consultation activities occurred, but whether they successfully informed and engaged the communities most directly affected by the proposal.

Accordingly, this chapter considers whether the Applicant's February 2026 response has adequately addressed those concerns rather than simply describing the consultation activities that took place.

6.2 Consultation Must Be Measured by its Effectiveness

The Applicant's response places considerable emphasis on the number of consultation events undertaken, the information made available and the opportunities provided for members of the public to engage with the project. Those efforts are acknowledged.

However, consultation should not be assessed solely by the number of meetings held, newsletters distributed or webpages published.

The true measure of consultation is whether local communities were given a genuine opportunity to understand the proposal, raise concerns and influence the development of the project.

Having reviewed the Applicant's response, I respectfully submit that much of the additional information explains what consultation activities were undertaken but provides comparatively

limited evidence demonstrating how the concerns raised by local residents influenced the subsequent evolution of the project.

For this reason, I believe the Commission should distinguish between demonstrating that consultation occurred and demonstrating that the consultation process achieved its intended purpose.

6.3 Consultation with the Local Community

As someone living in the immediate area, I believe there is an important distinction between making information available and ensuring that it reaches the people most directly affected by a proposed development.

The Applicant's response refers to engagement with the local community through public consultation events, newsletters and online information.

While these initiatives formed part of the consultation programme, I do not believe the response adequately addresses the concerns expressed by many residents regarding the effectiveness of that engagement.

A considerable number of observations were submitted during the planning process by residents living close to the proposed development. In my view, the volume and nature of those observations demonstrate that many significant concerns remained unresolved despite the consultation process described by the Applicant.

This does not necessarily mean that the consultation failed to comply with statutory requirements. However, it does raise legitimate questions as to whether the process achieved meaningful engagement with those communities most directly affected by the proposal.

6.4 Consultation with Local Organisations

During the planning process, concerns were raised regarding the extent to which established community organisations were actively engaged during the development of the project.

In particular, questions were raised regarding engagement with local community organisations, sporting organisations and educational facilities serving the Barnaderg and Killrerin area.

Having reviewed the Applicant's response, I do not believe it fully explains:

- which local organisations were consulted;
- the issues they raised;
- how those issues influenced the project design; or
- why concerns that remained unresolved did not result in further engagement.

As a local resident, I believe these are reasonable questions for the Commission to consider when assessing the overall effectiveness of the consultation process.

6.5 Local Newspaper Notices and Community Awareness

One issue that I do not believe has been adequately addressed in the Applicant's response relates to the effectiveness of the newspaper notices used to inform the local community.

I acknowledge that the Applicant complied with the statutory requirements relating to newspaper publication.

However, statutory compliance should not automatically be regarded as demonstrating effective communication with those communities most directly affected by the proposal.

The statutory notices were published in the *Irish Examiner* and the *Connacht Tribune*. While these newspapers satisfy the statutory requirements, they are not generally regarded as the principal local newspaper serving the Barnaderg, Killrerin and wider Tuam area.

In my experience, the **Tuam Herald** is the newspaper most commonly associated with local news and community affairs in this area. It is therefore reasonable to question whether publication in the *Tuam Herald* would have been more effective in bringing the proposal to the attention of those residents most directly affected.

I also note that significant reliance was placed upon project websites and online material throughout the consultation process. While digital engagement is an important element of

modern consultation, it should complement, rather than replace, communication methods that effectively reach local communities.

For these reasons, I respectfully submit that the Commission should distinguish between compliance with the statutory notification requirements and the broader objective of ensuring meaningful public awareness and participation.

6.6 Project Changes Following Consultation

The Applicant explains that aspects of the project evolved following consultation, including changes to elements of the electrical infrastructure.

I acknowledge that project evolution is a normal part of the planning process and that consultation can contribute positively to design improvements.

However, I do not believe the Applicant's response clearly demonstrates:

- which changes resulted directly from issues raised by local residents or community organisations;
- how those changes addressed the concerns expressed during consultation; or
- whether additional engagement was undertaken where significant changes occurred.

The Commission is respectfully requested to consider whether the consultation process remained meaningful throughout the evolution of the project rather than only during the initial stages of project development.

6.7 Overall Assessment of the Applicant's Response

Having reviewed the Applicant's February 2026 response, I accept that an extensive programme of consultation was undertaken and that the Applicant has provided a detailed account of those activities.

However, I do not believe the response materially addresses the concerns raised by local residents regarding the effectiveness of that consultation.

In my view, the response largely explains what consultation activities took place but provides comparatively limited evidence demonstrating how those activities influenced the project or addressed the concerns expressed by the communities most directly affected.

As a resident living in the area, my experience is that many local people continued to have significant concerns regarding the proposed development despite the consultation programme described by the Applicant.

I therefore respectfully request that the Commission consider not only whether consultation occurred, but whether it achieved its intended purpose of facilitating meaningful engagement with those communities most directly affected by the proposed development.

6.8 Matters Remaining for the Commission's Determination

I respectfully request that the Commission consider the following matters:

- Whether the Applicant's February 2026 response materially addresses the concerns raised regarding the effectiveness of public consultation.
- Whether consultation adequately engaged those communities and organisations most directly affected by the proposed development.
- Whether the methods used to notify the local community were the most effective means of promoting public awareness, particularly having regard to the role of the *Tuam Herald* as the principal local newspaper.
- Whether the Applicant has demonstrated how consultation influenced the evolution of the project.
- Whether the consultation process achieved meaningful community engagement rather than simply compliance with the statutory consultation requirements.

7. Land, Soils, Peat and Geology

7.1 Introduction

The Applicant's February 2026 responses seek to reassure the Commission that the original ground investigations, Peat Stability Risk Assessment (PSRA), Peat and Spoil Management

Plan and associated geotechnical assessments remain robust notwithstanding the concerns raised by Galway County Council, prescribed bodies and third-party observers.

The Applicant concludes that the investigations undertaken are sufficient to characterise the ground conditions across the site and that the proposed mitigation measures will ensure that construction can proceed without giving rise to unacceptable geotechnical or environmental risks.

It is acknowledged that a substantial programme of intrusive site investigation has been undertaken and that the Applicant has provided detailed explanations of the methodologies adopted. However, the principal question before the Commission is not whether investigations have been undertaken, but whether the information now before it provides sufficient certainty regarding the geological and peat conditions across the development footprint to enable an informed planning decision.

This chapter focuses specifically on land, soils, peat and geology. Issues relating to groundwater, hydrogeology, surface water and drinking water protection are considered separately in Chapter 8.

The Commission is respectfully requested to distinguish between confidence expressed in the assessment by the Applicant and the objective evidence upon which that confidence is based. Where uncertainty remains regarding peat distribution, ground conditions or construction methodology, the Commission should carefully consider whether that uncertainty has been reduced to an acceptable level before development consent is granted.

7.2 The Precautionary Principle

The proposed development includes turbine foundations, crane hardstands, permanent access tracks and associated infrastructure across areas containing peat soils and variable ground conditions.

Construction on peatland presents recognised engineering and environmental challenges. The characteristics of peat can vary significantly over relatively short distances, while changes in

ground conditions may influence excavation requirements, construction methodology and the volume of excavated material requiring management.

For this reason, the precautionary principle is particularly relevant when considering developments on peatland.

The Commission's task is not to determine whether geotechnical failure is likely to occur. Rather, it must determine whether sufficient objective information has been provided to demonstrate that likely significant environmental effects associated with peat disturbance have been properly identified, assessed and, where necessary, mitigated.

Where uncertainty remains regarding baseline ground conditions, the Commission should consider whether it is appropriate for that uncertainty to be addressed after development consent has been granted or whether additional certainty is required at the application stage. This is particularly important where the environmental assessment relies upon assumptions regarding peat depth, excavation volumes, slope stability or construction techniques.

7.3 Ground Investigation Programme

The Applicant's responses outline an extensive programme of intrusive ground investigation undertaken across the proposed development site.

The investigations include peat probing, trial pits, boreholes and other geotechnical investigations designed to inform the assessment of peat stability and construction suitability. The scale of this investigation programme is acknowledged and demonstrates that considerable resources have been devoted to understanding the site's ground conditions.

However, the issue raised by Galway County Council and third-party observers was not simply the number of investigations undertaken.

The more important question is whether the investigation programme adequately characterises the variability of ground conditions across those locations where the greatest engineering and environmental sensitivity exists.

In particular, the Commission should consider whether the investigation programme provides sufficient information regarding:

- turbine foundation locations;
- crane hardstand locations;
- permanent and temporary access tracks;
- areas of deeper peat;
- transitions between peat and mineral soils;
- areas where excavation or peat management may be most significant.

The Applicant's responses describe the overall investigation programme in considerable detail. However, comparatively less attention is given to demonstrating why the spatial distribution of investigations provides sufficient confidence that local variations in peat and subsoil conditions have been fully characterised across the development footprint.

7.4 Spatial Distribution of Ground Investigations

Ground investigations should be considered not only in terms of their quantity but also their distribution.

Peatland environments are inherently variable. Peat depth, composition and engineering properties can change over relatively short distances, particularly where peat interfaces with mineral soils or where localised depressions have accumulated deeper deposits over time.

Accordingly, the effectiveness of a ground investigation programme depends upon whether investigations have been concentrated in those areas where uncertainty has the greatest potential to influence construction methodology or environmental effects.

The Applicant has explained the methodology adopted in designing the investigation programme. Nevertheless, the Commission should be satisfied that the investigations undertaken adequately represent the full range of ground conditions likely to be encountered during construction.

This is particularly relevant where infrastructure requiring substantial excavation, such as turbine foundations and crane hardstands, is proposed within areas of variable peat depth.

Where localised variations remain possible, the Commission should consider whether the level of confidence currently available is sufficient to support the conclusions presented within the Peat Stability Risk Assessment and related documents.

7.5 Localised Deep Peat and Residual Uncertainty

One of the more significant acknowledgements within the Applicant's responses is that localised pockets of deeper peat may exist beyond those identified during the intrusive ground investigations.

This acknowledgement is important because it recognises that, notwithstanding the extent of the investigation programme, the ground investigation cannot identify every local variation in peat depth across the site.

The Applicant concludes that the existence of such localised areas would not materially alter the conclusions of the Peat Stability Risk Assessment.

While that conclusion may ultimately prove correct, the February 2026 responses provide comparatively limited additional evidence demonstrating why unidentified areas of deeper peat would not influence:

- foundation design;
- excavation requirements;
- peat excavation volumes;
- peat storage and management;
- construction methodology; or
- the assessment of geotechnical risk.

The Commission should distinguish between the possibility that deeper peat may exist and the implications that such variability could have for construction and environmental assessment.

The issue is not whether every variation can be identified in advance. Rather, it is whether the remaining uncertainty is sufficiently limited to enable the Commission to conclude that the likely significant effects associated with peat disturbance have been adequately assessed.

Where uncertainty persists regarding localised peat conditions, careful consideration should be given to whether that uncertainty has been appropriately addressed through the environmental assessment or whether important aspects of the assessment remain dependent upon investigations that will only occur during detailed design or construction.

7.6 Construction Methodology and Peat Management

The Applicant's February 2026 responses describe a range of engineering measures intended to minimise disturbance to peat and underlying soils during construction. These include the use of floating access tracks where appropriate, carefully designed turbine foundations, controlled excavation methodologies and the implementation of a Peat and Spoil Management Plan.

The adoption of recognised construction methodologies is welcomed and reflects established practice for wind energy developments in areas containing peatland.

However, the Commission's role extends beyond determining whether appropriate construction techniques have been proposed. It must also be satisfied that the assumptions upon which those techniques are based are supported by sufficient site-specific information.

Construction methodology is inherently dependent upon the ground conditions encountered. Variations in peat depth, subsoil composition, bearing capacity and slope stability may influence:

- the extent of excavation required;
- foundation design;
- the volume of peat requiring excavation or management;
- the suitability of floating road construction;
- the location and design of crane hardstands; and
- the quantity of imported construction materials.

Where these assumptions are based upon ground conditions that remain subject to refinement during detailed design, the Commission should carefully consider whether the environmental assessment fully captures the likely range of construction activities that may ultimately be required.

The Applicant's responses provide reassurance that construction methodologies can be adapted should local ground conditions vary. While engineering flexibility is both necessary and appropriate, adaptive construction techniques should not substitute for a sufficiently robust understanding of baseline site conditions at the time planning permission is determined.

7.7 Deferred Investigation and Construction-Stage Verification

A recurring feature of the Applicant's responses is the acknowledgement that further inspections and investigations will take place during detailed design and throughout the construction phase.

The Applicant explains that these additional investigations will assist in confirming local ground conditions, identifying isolated areas of deeper peat and informing the final construction methodology where necessary.

Such investigations are recognised elements of good engineering practice and are commonly employed during the delivery of large infrastructure projects.

Nevertheless, the Commission should distinguish between investigations that refine an already well-established understanding of site conditions and investigations that are necessary to determine whether significant environmental effects may arise.

The purpose of the Environmental Impact Assessment process is to enable likely significant effects to be identified and assessed before development consent is granted. Where important elements of the assessment remain dependent upon investigations that have yet to occur, the Commission should carefully consider whether sufficient information presently exists to support a fully informed planning decision.

This is particularly relevant where post-consent investigations may influence excavation volumes, construction techniques or the environmental mitigation required during construction.

The Applicant's responses do not fully explain the extent to which future investigations could alter assumptions that underpin the current environmental assessment.

7.8 Monitoring Does Not Replace Assessment

The Applicant places considerable reliance upon construction supervision, environmental monitoring, geotechnical inspection and adaptive management procedures as mechanisms for ensuring that construction proceeds safely and in accordance with best practice.

These measures are important components of responsible construction management and can significantly reduce environmental risk.

However, monitoring should not be regarded as a substitute for environmental assessment.

There is an important distinction between monitoring undertaken to confirm that predicted impacts remain within acceptable limits and monitoring that is relied upon to establish baseline conditions or determine whether an environmental impact exists. The former represents good environmental management.

The latter may indicate that aspects of the assessment remain uncertain at the time planning permission is being considered.

The Commission should therefore distinguish between mitigation measures designed to manage known impacts and measures that seek to resolve uncertainty regarding the underlying assessment.

Where monitoring is relied upon because aspects of the baseline environment remain incompletely characterised, careful consideration should be given to whether additional certainty is required before development consent is granted.

7.9 Overall Conclusion

The Applicant has undertaken a substantial programme of geotechnical investigation and has provided detailed explanations of the methodologies adopted in assessing peat stability and construction suitability.

The Applicant's February 2026 responses provide additional clarification regarding those methodologies and explain why the Applicant considers the original assessment to remain robust.

However, clarification should not be confused with the provision of materially new evidence. The principal issues identified by Galway County Council and third-party observers relate not simply to the quantity of investigations undertaken, but to the extent to which the available information fully characterises local ground variability and provides sufficient certainty regarding construction requirements across the development footprint.

The Applicant's responses acknowledge that localised variations in peat conditions may exist and that further investigations will be undertaken during detailed design and construction. While these commitments represent recognised engineering practice, they also indicate that aspects of the final construction methodology remain dependent upon information that will only become available after planning permission has been granted.

Accordingly, the Commission is respectfully requested to consider whether the information currently before it provides sufficient certainty regarding land, soils, peat and geology to support the conclusions presented within the Environmental Impact Assessment and to enable an informed determination of the application.

7.10 Matters Remaining for the Commission's Determination

In light of the foregoing, the Commission is respectfully requested to consider the following matters:

- Whether the existing programme of ground investigation adequately characterises the variability of peat and geological conditions across the development footprint.
- Whether the spatial distribution of intrusive investigations provides sufficient confidence in those areas where the greatest engineering and environmental sensitivity exists.
- Whether acknowledged localised areas of deeper peat introduce uncertainty that should be resolved before development consent is granted.
- Whether the proposed construction methodologies are fully supported by the current understanding of site conditions.
- Whether reliance upon construction-stage investigations and adaptive management indicates that aspects of the environmental assessment remain uncertain at the time of determination.

- Whether environmental monitoring is being relied upon to manage identified impacts or to resolve uncertainties that are fundamental to the assessment itself.
- Whether the information presently before the Commission provides sufficient certainty regarding land, soils, peat and geology to satisfy the requirements of proper planning and sustainable development.

8. Hydrology, Hydrogeology, Karst and Drinking Water Resources

8.1 Introduction

The protection of water resources is one of the most important environmental considerations associated with the proposed Cooloo Wind Farm. Throughout the planning process, significant attention has been given to the potential effects of the proposed development on surface water, groundwater, hydrogeology, karst, drinking water sources and the wider receiving environment. These issues were raised not only by local residents, but also by statutory consultees including Galway County Council, the Geological Survey Ireland (GSI), the Health Service Executive (HSE) and other prescribed bodies.

In response to these concerns, the Applicant submitted a detailed response together with additional hydrogeological information, updated groundwater monitoring data and a comprehensive Karst Risk Assessment. I acknowledge the considerable amount of technical work that has been undertaken and the substantial body of information now before the Commission.

However, the purpose of this submission is not to repeat my original observations nor to challenge the competence of the technical specialists engaged by the Applicant. Rather, my objective is to assist the Commission in determining whether the Applicant's February 2026 response has materially addressed the concerns raised during the planning process and whether the information now available provides a sufficiently robust evidential basis upon which the Commission can complete its own independent Environmental Impact Assessment and Appropriate Assessment.

This issue is of particular importance to me because my family home is supplied by the **Barnaderg Gortbeg Group Water Scheme**. Consequently, the protection of local

groundwater resources is not simply a matter of general environmental interest but one of direct relevance to my household and to many other families within the local community who rely on this supply for their drinking water.

While I recognise that no major infrastructure project can ever be entirely without environmental risk, I respectfully submit that developments located within sensitive hydrogeological environments require a particularly high standard of assessment and scientific certainty. It is therefore important that the Commission is fully satisfied that the Applicant's response has adequately addressed the issues identified during consultation before determining the application.

Given that my family home is supplied by the Barnaderg Gortbeg Group Water Scheme, I have reviewed the Applicant's hydrological and hydrogeological assessments with particular care. The observations that follow are intended to assist the Commission in determining whether the additional information submitted by the Applicant has adequately addressed the outstanding issues identified during the planning process.

8.2 Scope of this Chapter

This chapter has been prepared following a review of the Applicant's Environmental Impact Assessment Report, the additional information submitted during the planning process, the Applicant's February 2026 Response to Submissions, the Hydrology and Hydrogeology assessments, the Geotechnical Karst Risk Assessment and the observations of the prescribed bodies.

The purpose of this chapter is not to repeat the original objections made during the planning process but to consider whether the Applicant's additional information has materially addressed the concerns previously raised regarding groundwater, hydrogeology, karst, drinking water protection and the wider hydrological environment.

In preparing this chapter, I acknowledge the extensive technical investigations undertaken by the Applicant. My observations focus on whether the additional information now before An Coimisiún Pleanála provides sufficient certainty that the proposed development will not

adversely affect groundwater resources, the Barnaderg Gortbeg Group Water Scheme or the surrounding hydrological environment.

8.3 General Observations on the Applicant's Response

The Applicant's February 2026 response addresses a wide range of issues relating to hydrology and hydrogeology. It refers to the original EIAR, supplementary groundwater investigations, long-term monitoring results, geophysical surveys, hydrochemical analysis, peat investigations and the Karst Risk Assessment, concluding that the proposed development can proceed without giving rise to unacceptable impacts on groundwater, surface water or drinking water resources. The Applicant also concludes that the embedded design measures and proposed mitigation—including drainage controls, construction management procedures, groundwater monitoring, pollution prevention measures and environmental supervision—will ensure that potential effects are avoided or reduced to acceptable levels.

I acknowledge that the Applicant has undertaken a comprehensive programme of investigation. The hydrological assessment has evolved over several years and is supported by an extensive body of technical documentation. The groundwater monitoring programme extends over a significant period and includes monitoring boreholes, surface water sampling, groundwater chemistry, seasonal monitoring and detailed geological investigations. The preparation of a dedicated Karst Risk Assessment also demonstrates that the Applicant recognises the sensitivity of the geological environment.

However, having carefully reviewed both the original application and the Applicant's response, I respectfully submit that much of the additional material provides **further explanation of the original assessment rather than materially changing the evidential basis upon which the original conclusions were reached.**

Throughout the response there is a recurring reliance on conclusions already presented within the EIAR, with additional narrative explaining why those conclusions remain valid. While such clarification is useful, the Commission must determine whether the additional information has materially reduced the uncertainty identified during the planning process or whether it primarily reinforces the Applicant's existing position. In my opinion, this distinction is important.

The purpose of the current consultation is not simply to allow the Applicant to restate confidence in its own assessment. Rather, it is to provide the Commission with any additional information necessary to independently determine whether the proposed development can proceed without unacceptable effects on the receiving environment.

I therefore respectfully request that the Commission consider whether the additional investigations and explanations now provided materially strengthen the environmental assessment or whether they primarily support conclusions already contained within the original EIAR.

8.4 Existing Hydrological and Hydrogeological Environment

The Applicant's EIAR describes the proposed development as being located within the **Lough Corrib Catchment**, with local drainage flowing principally through the **Grange** and **Abbert** sub-catchments before ultimately discharging to Lough Corrib. The hydrological assessment identifies a network of streams, drains and watercourses throughout and surrounding the site, many of which are hydraulically connected to the wider catchment.

The Applicant also identifies groundwater as an important environmental receptor. The site is underlain by a **Regionally Important Aquifer**, with areas of **High** and **Extreme Groundwater Vulnerability** identified across parts of the development area. Ground investigations undertaken by the Applicant identified shallow bedrock at a number of turbine locations, reflecting the complex hydrogeological characteristics of the site.

The EIAR further recognises that the hydrogeological environment is influenced by karstified limestone bedrock, variable subsoil thicknesses and groundwater pathways that require careful assessment when considering the potential effects of excavation, drainage works, turbine foundations, access tracks and other construction activities.

The Applicant has undertaken an extensive programme of investigations including:

- geological and geotechnical investigations;
- groundwater monitoring boreholes;
- groundwater level monitoring;

- hydrochemical sampling;
- geophysical surveys;
- infiltration testing;
- peat depth surveys; and
- a dedicated Karst Risk Assessment.

This represents a substantial body of technical work and provides the baseline information upon which the Applicant's conclusions are based.

Nevertheless, the Commission's role is not simply to acknowledge that investigations have been undertaken. Rather, it must determine whether those investigations provide sufficient certainty to conclude that the proposed development will not adversely affect sensitive groundwater receptors, drinking water supplies or the wider hydrological environment.

In my opinion, this is particularly important because the Applicant's own assessment identifies the receiving environment as hydrogeologically sensitive. Where developments are proposed within areas characterised by regionally important aquifers, high groundwater vulnerability and karstified limestone geology, a robust and precautionary assessment is essential.

8.5 Barnaderg Gortbeg Group Water Scheme

One of my principal concerns relates to the protection of the **Barnaderg Gortbeg Group Water Scheme**, which supplies drinking water to my home and to many other households in the local area.

The Applicant concludes that the proposed development will not adversely affect the Group Water Scheme and refers to the hydrogeological investigations undertaken in support of that conclusion. I acknowledge that this issue has been considered in the Applicant's assessment and that additional information has been provided within the February 2026 response.

However, because my family depends upon this water supply on a daily basis, I have carefully reviewed the additional information to determine whether it materially addresses the concerns raised during consultation.

In my respectful opinion, the Applicant's response largely explains why the original assessment remains valid rather than providing significantly new evidence that changes the basis upon which those conclusions were reached.

This is not to suggest that the Applicant's assessment is necessarily incorrect. Rather, it is to recognise that the Commission must independently determine whether the available scientific evidence provides sufficient certainty regarding the long-term protection of the Barnaderg Gortbeg Group Water Scheme.

The Applicant's own documentation identifies public water supplies, Group Water Schemes, groundwater abstractions and groundwater-dependent receptors as among the most sensitive environmental receptors associated with the proposed development. I agree with that assessment.

The protection of drinking water resources should, in my view, be afforded the highest level of consideration throughout the Commission's assessment. This is particularly important where groundwater pathways may be influenced by excavation, drainage works or construction activities within a hydrogeologically complex environment.

I therefore respectfully request that the Commission carefully consider whether the Applicant's February 2026 response has materially strengthened the evidence relating to the protection of the Barnaderg Gortbeg Group Water Scheme, or whether additional explanation has primarily been provided in support of conclusions already reached within the original EIAR.

8.6 Groundwater Vulnerability and Aquifer Protection

A recurring theme throughout the Applicant's Environmental Impact Assessment Report (EIAR), the Further Information and the February 2026 response is the sensitivity of the underlying groundwater environment. The Applicant identifies the site as being underlain by a **Regionally Important Aquifer**, with areas of **High** and **Extreme Groundwater Vulnerability** mapped across parts of the proposed development. The hydrogeological investigations also identify shallow bedrock at a number of turbine locations and variable subsoil thicknesses across the site.

These characteristics do not mean that the proposed development cannot proceed. However, they do mean that the receiving environment has a reduced natural capacity to attenuate pollutants should contamination occur. Consequently, any assessment of construction activities, excavation, drainage works or accidental pollution events requires a high degree of scientific confidence.

The Applicant concludes that, following detailed investigation and the implementation of mitigation measures, the proposed development will not give rise to significant adverse effects on groundwater resources.

I acknowledge that conclusion and the extensive investigations undertaken to support it. Nevertheless, I respectfully submit that the Commission should consider the significance of the Applicant's own findings. The identification of High and Extreme groundwater vulnerability, together with shallow bedrock and a regionally important aquifer, demonstrates that the hydrogeological environment is inherently sensitive. In such circumstances, the robustness of the assessment is of critical importance, particularly where local drinking water supplies may be dependent upon the same groundwater resource.

The Applicant's response provides additional explanation of the investigations undertaken but, in my view, does not materially alter the hydrogeological characteristics of the site as described in the EIAR. The Commission should therefore consider whether the conclusions reached are fully supported by the evidence now before it and whether the level of certainty required for a development in such a sensitive hydrogeological setting has been achieved.

8.7 Geological Survey Ireland and Health Service Executive Observations

One aspect of the planning process that I consider particularly significant is the advice provided by the State's prescribed bodies during consultation.

The Geological Survey Ireland (GSI), as the State's specialist adviser on geology and groundwater, highlighted a number of matters requiring careful consideration during the assessment of the proposed development. These included groundwater vulnerability, source

protection areas, Zones of Contribution, groundwater abstractions, groundwater and surface water interaction, karstification and the protection of drinking water resources.

Similarly, the Health Service Executive (HSE) emphasised the importance of identifying and protecting public water supplies, Group Water Schemes and private drinking water sources throughout both the construction and operational phases of the development.

These observations were not objections to the development itself. Rather, they identified matters which required detailed assessment before the Commission could be satisfied that drinking water resources would remain protected.

Having reviewed the Applicant's February 2026 response, I acknowledge that each of these matters has been addressed and that additional technical information has been provided.

However, I respectfully submit that the Commission should independently consider whether the Applicant's response has fully resolved the concerns identified by these statutory consultees or whether the response primarily explains why the Applicant remains satisfied with its original conclusions.

This distinction is particularly important because the observations of Geological Survey Ireland and the Health Service Executive were made independently of both the Applicant and local residents. They therefore provide an objective indication of the matters considered most important by the State's own technical advisers.

8.8 Zone of Contribution and Source Protection

The Applicant's assessment places considerable emphasis on groundwater flow, groundwater pathways and the protection of drinking water sources.

As someone whose family relies upon the Barnaderg Gortbeg Group Water Scheme for our daily drinking water, I have paid particular attention to the assessment of the **Zone of Contribution (ZOC)** and the associated source protection measures.

A Zone of Contribution represents the area from which groundwater may ultimately flow towards a drinking water abstraction. Within such areas, activities capable of affecting

groundwater quality require careful assessment to ensure that the integrity of the water supply is maintained.

The Applicant concludes that the proposed development will not adversely affect groundwater resources or the Barnaderg Gortbeg Group Water Scheme. I acknowledge that conclusion and recognise that the Applicant has undertaken additional hydrogeological investigations in support of its assessment.

Nevertheless, I respectfully submit that the Commission should carefully consider whether the February 2026 response materially strengthens the evidence relating to groundwater pathways, hydraulic connectivity and source protection or whether it principally provides further explanation of the original assessment.

Given the recognised sensitivity of the hydrogeological environment and the importance of the Barnaderg Gortbeg Group Water Scheme to local residents, I believe it is appropriate that the Commission applies a precautionary approach when considering these matters.

This is not to suggest that adverse effects will occur. Rather, it reflects the importance of ensuring that the available scientific evidence provides sufficient confidence that the water supply will remain protected throughout both construction and operation.

Where uncertainty remains regarding groundwater pathways, source protection or the interaction between construction activities and groundwater resources, I respectfully request that the Commission carefully consider whether that uncertainty has been reduced to an acceptable level before determining the application.

8.9 Karst Hydrogeology and Geological Risk Assessment

One of the most significant additions to the Applicant's February 2026 response is the inclusion of a dedicated **Geotechnical Karst Risk Assessment**, prepared to assess the potential influence of karst geology on the proposed development. The report sets out a structured assessment process, including desk studies, field reconnaissance, intrusive ground investigations, geophysical surveys, hazard classification, engineering mitigation measures and recommendations for further investigation.

I welcome the preparation of this report and acknowledge that it represents a significant enhancement to the information available to the Commission. The assessment demonstrates that the Applicant has recognised the complexity of the geological environment and has undertaken additional work to better understand the potential geotechnical risks associated with the development.

The report identifies **41 potential karst features within 1 kilometre of the proposed wind farm**, including **13 potential features within the EIAR site boundary**, the majority of which were investigated during site inspections. Most of these features are classified as enclosed depressions (dolines), with two possible spring features also identified.

The Applicant further notes that the greatest concentration of potential karst features occurs in the south-eastern part of the site, particularly in the vicinity of **Turbine T4 and its associated access road**. Additional geophysical investigations, including electrical resistivity tomography (ERT), trial pits and geological mapping, were undertaken in this area to determine whether these depressions were associated with active karstification.

The assessment concludes that the majority of the proposed infrastructure is located within areas of **low to medium karst hazard**, while **Turbine T4** and a short section of its access road were identified as lying within an area of **high karst hazard** prior to mitigation. Following the implementation of engineering mitigation measures, the Applicant concludes that the residual risk reduces to low or medium and that development can proceed, subject to those mitigation measures being implemented and the completion of further confirmatory ground investigation. I acknowledge these findings. However, I also note that the Applicant's own conclusion recognises that the acceptability of the residual risk is contingent upon two important conditions:

- the successful implementation of engineering mitigation measures; and
- further confirmatory ground investigation before or during detailed design.

In my respectful opinion, this is an important planning consideration. It demonstrates that the Applicant accepts that further investigation remains necessary before the geological model can be fully confirmed.

This does not mean that the proposed development is unsuitable. However, I respectfully submit that the Commission should carefully consider whether the remaining reliance upon

future investigation and engineering design introduces a level of uncertainty that is material to the determination of the application.

8.10 Groundwater Monitoring and Site Investigations

The Applicant has undertaken an extensive programme of site investigation and hydrogeological monitoring over a period extending from **2022 to 2025**. This programme included:

- detailed walkover surveys;
- hydrological mapping;
- geological mapping;
- **306 peat probes;**
- **26 trial pits;**
- **10 gouge cores;**
- **2 investigation boreholes (BH1 and BH2);**
- electrical resistivity and seismic geophysical surveys;
- continuous groundwater level monitoring between **October 2022 and February 2025;**
- groundwater and surface water sampling; and
- hydrochemical testing.

I acknowledge the extent of this investigation programme. It represents a substantial body of baseline information and provides a considerably stronger understanding of the site's hydrogeological characteristics than would otherwise have been available.

In particular, the installation of monitoring boreholes and the collection of groundwater level data over more than two years provides valuable information regarding seasonal groundwater behaviour and groundwater response to climatic variation. The use of geophysical surveys in areas of potential karstification also demonstrates an effort to verify the geological interpretation through multiple investigative techniques.

Nevertheless, baseline monitoring should be viewed as one component of the environmental assessment rather than, in itself, a guarantee that all uncertainties have been resolved.

Groundwater monitoring describes existing conditions and provides confidence in the conceptual hydrogeological model. The Commission must still determine whether the information obtained is sufficient to conclude that the proposed construction activities—including excavation for turbine foundations, crane hardstands, access tracks, cable trenches and drainage infrastructure—can proceed without giving rise to unacceptable impacts on groundwater resources or drinking water supplies.

As someone whose household depends upon the Barnaderg Gortbeg Group Water Scheme, I respectfully request that particular attention be given to the adequacy of the monitoring programme in demonstrating long-term protection of local groundwater resources.

8.11 Construction Phase Risks

The Applicant identifies the construction phase as the period during which the greatest potential exists for impacts upon the hydrological environment. This reflects the fact that construction activities involve excavation, temporary exposure of soils and bedrock, movement of peat and mineral soils, installation of drainage infrastructure, concrete works, storage of fuels and oils, and increased construction traffic.

The EIAR and the Applicant's response identify a range of potential risks, including:

- sediment mobilisation;
- accidental fuel or chemical spillages;
- concrete contamination;
- changes to natural drainage patterns;
- disturbance of peat and mineral subsoils;
- localised groundwater ingress into excavations; and
- temporary deterioration in surface water quality.

The Applicant concludes that these risks can be effectively managed through the implementation of the Construction Environmental Management Plan (CEMP), Pollution Prevention Measures, drainage controls, monitoring and environmental supervision.

I acknowledge that these measures represent recognised industry practice and are commonly incorporated within major infrastructure projects.

However, I respectfully submit that the Commission should distinguish between:

- **identifying potential risks;**
- **proposing measures to control those risks; and**
- **demonstrating, with sufficient confidence, that residual effects will not be significant.**

In my opinion, much of the Applicant's February 2026 response understandably concentrates on explaining the proposed mitigation strategy. While this provides reassurance that appropriate construction controls are proposed, the Commission must still be satisfied that the underlying hydrogeological assessment provides a robust basis for concluding that the identified risks can be managed successfully within this particular geological setting.

This is especially important where construction is proposed within an area characterised by high groundwater sensitivity, regionally important aquifers and the presence of karst features.

8.12 Reliance on Mitigation Measures

Having reviewed the Applicant's February 2026 response, one recurring theme is the significant reliance placed upon construction-stage mitigation, environmental management and monitoring.

These include:

- construction environmental management plans;
- drainage design;
- pollution prevention measures;
- groundwater monitoring;
- environmental clerk of works supervision;
- engineering mitigation;
- post-investigation refinement of design; and
- confirmatory ground investigation.

These measures are important and, in many respects, represent good engineering practice.

However, I respectfully submit that mitigation should complement a robust environmental assessment rather than compensate for any remaining uncertainty regarding the receiving environment.

The Karst Risk Assessment itself concludes that further confirmatory ground investigation is required before the assessment can be fully refined and that residual risks remain dependent upon the successful implementation of mitigation measures.

I do not suggest that this is unusual for infrastructure projects. Nevertheless, because the proposed development is located within a hydrogeologically sensitive area that includes a source protection area associated with the Barnaderg Gortbeg Group Water Scheme, I respectfully request that the Commission carefully consider whether sufficient certainty has been achieved at the planning stage.

8.13 Overall Assessment of the Applicant's Response

Having carefully reviewed the original Environmental Impact Assessment Report (EIAR), the Further Information submitted by the Applicant, the February 2026 response to submissions and the accompanying technical reports, I acknowledge that the Applicant has undertaken a substantial programme of hydrogeological investigation. This includes detailed desk studies, intrusive site investigations, groundwater and surface water monitoring, hydrochemical analysis, peat investigations, geophysical surveys and the preparation of a dedicated Karst Risk Assessment.

The quantity and quality of the technical work undertaken is recognised and should be acknowledged. It has significantly improved the understanding of the site's geological and hydrogeological characteristics and has enabled a more detailed assessment than was available at the time of the original application.

However, the purpose of the present consultation is not simply to assess the volume of information submitted. Rather, it is to determine whether the Applicant's additional information has materially addressed the concerns raised by statutory consultees, local residents and the Commission itself.

In my respectful opinion, the Applicant's response provides a more detailed explanation of its original conclusions but does not fundamentally alter the principal assumptions upon which those conclusions are based. Throughout the response there remains a significant reliance upon:

- the conceptual hydrogeological model presented in the original EIAR;
- the effectiveness of embedded design measures;
- construction-stage mitigation;
- environmental monitoring;
- ongoing supervision by suitably qualified specialists; and
- further investigation where required during detailed design and construction.

These are all appropriate components of a modern infrastructure project. Nevertheless, I respectfully submit that they should not replace the requirement for the Commission to be satisfied, at the time of determining the application, that the environmental effects have been adequately assessed and that the conclusions reached are supported by sufficient objective evidence.

The Commission is required to make its own independent assessment of the information before it. In doing so, I respectfully request that particular consideration be given to the cumulative significance of the following factors:

- the presence of a Regionally Important Aquifer;
- areas of High and Extreme Groundwater Vulnerability;
- shallow bedrock across parts of the site;
- identified karst features and associated geological complexity;
- the proximity of public and group water supplies;
- the reliance of local households, including my own, on the Barnaderg Gortbeg Group Water Scheme; and
- the dependence of the Applicant's conclusions upon the successful implementation of mitigation and monitoring measures.

Each of these factors has been considered individually within the Applicant's assessment. However, I respectfully submit that the Commission should also consider their combined significance when determining the overall environmental sensitivity of the site.

8.14 Application of the Precautionary Principle

The proposed development is intended to make a positive contribution to Ireland's renewable energy objectives and I fully recognise the importance of increasing renewable electricity generation in support of national climate policy.

However, renewable energy projects must also demonstrate that they can proceed without giving rise to unacceptable environmental effects.

Where developments are proposed within hydrogeologically sensitive environments, the planning process requires a high degree of confidence that groundwater resources and drinking water supplies will remain protected throughout both construction and operation.

In this case, the Applicant concludes that appropriate mitigation measures will avoid significant adverse effects. I acknowledge that conclusion.

Nevertheless, the Applicant's own documentation identifies the receiving environment as one characterised by groundwater sensitivity, karstified limestone, shallow bedrock and important groundwater receptors. The Karst Risk Assessment also recommends further confirmatory investigation and continued engineering assessment in specific locations before final design is completed.

I respectfully submit that the Commission should therefore satisfy itself that any remaining uncertainty has been reduced to an acceptable level before development consent is granted. This is consistent with the precautionary approach that underpins Irish and European environmental assessment legislation and is particularly important where drinking water resources are concerned.

8.15 Matters Remaining for the Commission's Determination

Having reviewed the Applicant's February 2026 response and supporting documentation, I respectfully request that the Commission consider the following matters when determining the application:

1. Whether the additional hydrogeological information materially strengthens the evidence before the Commission or primarily provides further explanation of the original assessment.
2. Whether sufficient certainty has been demonstrated regarding the protection of the Barnaderg Gortbeg Group Water Scheme throughout both the construction and operational phases of the development.
3. Whether the assessment of groundwater pathways and hydraulic connectivity has been adequately demonstrated having regard to the identified groundwater vulnerability and karstified geological conditions.
4. Whether the conceptual hydrogeological model is supported by sufficient site-specific evidence to provide confidence in the conclusions reached.
5. Whether the significance of High and Extreme Groundwater Vulnerability has been fully reflected in the assessment of potential construction impacts.
6. Whether the relationship between groundwater vulnerability, shallow bedrock, karst features and proposed excavation works has been fully assessed.
7. Whether the Applicant's reliance upon future confirmatory investigations and detailed engineering design introduces any material uncertainty that should be resolved before consent is granted.
8. Whether the proposed mitigation measures are sufficiently detailed and robust to avoid significant impacts on groundwater resources under all reasonably foreseeable construction scenarios.
9. Whether the proposed groundwater monitoring programme is adequate to verify the effectiveness of mitigation throughout construction and operation.
10. Whether the cumulative interaction between geology, hydrogeology, peat excavation, drainage works and construction activities has been comprehensively assessed.
11. Whether the concerns identified by Geological Survey Ireland, the Health Service Executive and Galway County Council have been fully addressed by the Applicant's response.
12. Whether the Commission can be satisfied, on the basis of the information now before it, that the proposed development will not adversely affect groundwater resources, drinking water supplies or the wider hydrological environment.

8.16 Chapter Conclusion

I acknowledge the considerable effort undertaken by the Applicant in responding to the issues raised during the planning process and the extensive technical investigations now available to the Commission. The additional hydrogeological information, groundwater monitoring programme and Karst Risk Assessment have undoubtedly improved the understanding of the site's environmental characteristics.

However, having carefully reviewed the Applicant's February 2026 response, I remain concerned that much of the additional information serves to reinforce the conclusions of the original assessment rather than materially changing the evidential basis upon which those conclusions rely.

As a resident living within the vicinity of the proposed development, and as someone whose household depends upon the Barnaderg Gortbeg Group Water Scheme for our drinking water, I have a direct interest in ensuring that the Commission is fully satisfied that groundwater resources will be protected throughout the lifetime of the proposed development.

My submission is not intended to question the importance of renewable energy development or the professionalism of the Applicant's technical advisers. Rather, it is intended to assist the Commission by highlighting those aspects of the Applicant's response that, in my respectful opinion, continue to warrant careful consideration.

For the reasons outlined throughout this chapter, I respectfully request that An Coimisiún Pleanála carefully consider whether the Applicant's February 2026 response has fully resolved the outstanding hydrological and hydrogeological issues identified during the planning process and whether the information now before the Commission provides the level of scientific certainty required to support a grant of permission for development within such a sensitive hydrogeological environment.

9. Residential Amenity, Human Health and Quality of Life

9.1 Introduction

The protection of residential amenity and human health is a fundamental objective of the Irish planning system. While the proposed Cooloo Wind Farm has the potential to make a positive contribution to Ireland's renewable energy and climate objectives, it is equally important that the planning process ensures that the quality of life of those living closest to the development is adequately protected.

The Applicant's Environmental Impact Assessment Report (EIAR) and subsequent **Response to Third Party Submissions** conclude that the proposed development will not give rise to significant adverse effects on residential amenity following the implementation of embedded mitigation measures and proposed operational controls. The Applicant also concludes that construction impacts will be temporary and can be effectively managed through the implementation of the Construction Environmental Management Plan (CEMP), Construction Traffic Management Plan (CTMP) and other project-specific mitigation measures.

I acknowledge the extensive work undertaken by the Applicant and the considerable amount of technical information submitted in support of these conclusions. The Applicant has provided additional clarification regarding construction activities, traffic management, operational noise, shadow flicker, visual effects and environmental management procedures in response to issues raised during the planning process.

However, the purpose of this submission is not to repeat the observations previously made by local residents. Rather, it is to consider whether the Applicant's February 2026 response has **materially addressed** those observations and whether the additional information now before An Coimisiún Pleanála provides a sufficiently robust basis upon which the Commission can conclude that residential amenity will be adequately protected throughout both the construction and operational phases of the proposed development.

As a resident living **less than 200 metres from the proposed construction entrance on the R332**, my family and I will experience the development differently from many other residents.

Although our home is not among those closest to the proposed turbines, we will be directly affected by the day-to-day activity associated with the principal construction access throughout the construction period. This includes construction traffic, Heavy Goods Vehicle (HGV) movements, abnormal load deliveries, temporary traffic management measures, construction noise and the general disturbance associated with a major infrastructure project.

My observations are therefore based upon both a detailed review of the planning documentation and my personal knowledge of the local area, gained through living adjacent to the proposed construction route and using the R332 on a daily basis.

I fully recognise the importance of renewable energy development and do not oppose such development in principle. However, I respectfully submit that renewable energy projects should only proceed where the Commission is satisfied, on the basis of robust and objective evidence, that the effects on nearby residents have been comprehensively assessed and that any significant adverse effects have been avoided or reduced to acceptable levels.

Accordingly, this chapter examines whether the Applicant's response has adequately addressed the issues previously raised in relation to residential amenity, human health and quality of life, having particular regard to the cumulative effects of construction activity, traffic, operational noise, shadow flicker, landscape change and the overall living environment experienced by nearby residents.

9.2 Residential Amenity – General Response to the Applicant's Submission

The Applicant concludes that the proposed development complies with the relevant planning policy and guidance relating to residential amenity and that no unacceptable impacts are predicted following implementation of the proposed mitigation measures.

Having reviewed the Applicant's February 2026 response, I acknowledge that additional clarification has been provided regarding the assessment methodologies, environmental modelling and proposed mitigation measures. The response addresses concerns raised in submissions relating to construction activity, traffic, noise, shadow flicker, visual effects and other aspects of residential amenity.

While this additional information is welcomed, I respectfully submit that much of the Applicant's response provides further explanation of the original assessment rather than materially changing the conclusions reached within the EIAR. In my opinion, this distinction is important.

The purpose of the current consultation is not simply to enable the Applicant to reaffirm confidence in its original assessment. Rather, it is to provide the Commission with sufficient additional information to determine whether the issues raised during the planning process have been satisfactorily addressed.

Throughout the Applicant's response there is a recurring reliance upon compliance with recognised assessment methodologies, adherence to existing guidance and the implementation of mitigation measures during construction and operation. These are all relevant considerations and form an important part of the planning assessment.

However, compliance with technical guidance should not be regarded as the sole measure of residential amenity.

Residential amenity encompasses the overall quality of the living environment experienced by residents. It includes not only compliance with numerical standards relating to noise or shadow flicker, but also the cumulative effect of construction activity, traffic movements, landscape change, visual intrusion, disruption to daily life, enjoyment of private property and the character of the surrounding environment.

It is this broader concept of residential amenity that I respectfully request the Commission to consider when assessing the Applicant's response.

9.3 Completeness of the Residential Receptor Assessment

A matter of particular concern arising from my review of the planning application documentation and the Applicant's February 2026 Response to Third Party Submissions relates to the completeness of the residential receptor dataset used throughout the environmental assessment.

During my review of the planning documentation, I identified an **existing occupied dwelling (Eircode H53 FF64)** located in the vicinity of the proposed development, approximately **530 metres from Turbines T4 and T5 and approximately 600 metres from Turbine T8**, which does not appear to be identified within the Applicant's planning documentation.

This dwelling existed and was occupied prior to the submission of the planning application. However, I have been unable to establish from the planning documentation whether it formed part of the baseline residential receptor dataset used in preparing the Environmental Impact Assessment Report, including the assessments of operational noise, shadow flicker, visual amenity and other residential effects.

The identification of all existing residential properties is fundamental to the robustness of any residential amenity assessment. The reliability of the Applicant's conclusions depends upon the completeness and accuracy of the baseline information upon which those conclusions are based.

If this dwelling has not been included within the environmental assessment, then there is a possibility that the potential effects on that property have not been fully evaluated. Equally, if the dwelling was assessed but is not identifiable within the planning documentation, it is difficult for interested parties and the Commission to independently verify the completeness of the assessment.

I make this observation respectfully and without suggesting that the omission was intentional. Rather, I consider it to be a matter that merits clarification because it has the potential to influence several technical assessments contained within the EIAR, including operational noise, shadow flicker, landscape and visual impact, and the overall assessment of residential amenity.

Accordingly, I respectfully request that An Coimisiún Pleanála satisfy itself that all existing occupied dwellings within the potential zone of influence of the proposed development have been identified and assessed before relying upon the Applicant's conclusions regarding residential amenity.

9.4 Residential Amenity Extends Beyond Technical Compliance

The Applicant's February 2026 response addresses residential amenity by considering a number of separate environmental topics, including noise, shadow flicker, traffic, landscape and visual impact, air quality and construction management. Each of these topics is assessed independently using recognised methodologies and technical guidance, with the Applicant concluding that the resulting impacts will be acceptable following the implementation of mitigation measures.

I acknowledge that this approach is consistent with the structure of an Environmental Impact Assessment Report and reflects established assessment practice. However, I respectfully submit that the Commission should also consider the broader concept of residential amenity when determining this application.

Residential amenity cannot be assessed solely by reference to whether individual environmental parameters comply with published standards or guideline values. While compliance with recognised guidance is an important component of the assessment process, it should not be regarded as the only indicator of whether the living conditions of nearby residents will remain acceptable.

The planning system seeks to protect the overall quality of the residential environment. This includes not only measurable environmental effects but also the way in which those effects are experienced collectively by those living in the vicinity of a proposed development.

In practice, residents do not experience construction traffic, operational noise, visual effects, lighting, landscape change or construction activity in isolation. They experience these effects together, over extended periods, within the setting of their homes and daily lives.

In my opinion, this is particularly relevant in the case of the proposed Cooloo Wind Farm. While the Applicant concludes that each individual environmental effect is acceptable when assessed separately, the Commission should also consider the cumulative influence of those effects on the day-to-day living environment of nearby residents.

For those of us living close to the proposed development, residential amenity encompasses a wide range of factors including:

- the enjoyment of our homes and gardens;
- the character and tranquillity of the surrounding rural environment;
- the safety and convenience of the local road network;
- the ability to walk, cycle and travel safely within the area;
- visual changes to the surrounding landscape;
- temporary disruption associated with construction activities;
- changes to established traffic patterns;
- noise from construction activities and operational infrastructure; and
- the cumulative interaction of these effects over the duration of the project.

While each of these matters is addressed separately within the Applicant's environmental assessment, I respectfully submit that the Commission should also consider their combined effect upon the overall quality of the residential environment.

This is particularly important for residents located close to the proposed construction access, where the experience of the development may differ significantly from that of residents living elsewhere within the study area. Although the operational effects of the wind farm may be assessed primarily by reference to proximity to individual turbines, the construction phase will be experienced most acutely by those living adjacent to the principal access route.

As previously stated, my family home is located less than **200 metres from the proposed construction entrance on the R332**. Consequently, throughout the construction period we are likely to experience many aspects of the development on a daily basis, including increased Heavy Goods Vehicle (HGV) movements, abnormal load deliveries, construction traffic, temporary traffic management measures and associated construction activity.

While I acknowledge that these impacts will be temporary, I respectfully submit that their duration, frequency and cumulative nature should be given careful consideration when assessing overall residential amenity.

For these reasons, I believe the Commission should not confine its assessment solely to whether individual environmental standards have been achieved. Rather, it should also consider whether

the Applicant's February 2026 response provides sufficient reassurance that the combined effects of the proposed development will not result in an unacceptable deterioration in the quality of life experienced by those residents most directly affected.

9.5 Living Adjacent to the Principal Construction Access

Unlike many wind farm developments, the effects experienced by nearby residents are not limited to the operational phase. For households located close to the principal site entrance, the construction phase has the potential to become the most significant period of impact.

My family home is located less than **200 metres from the proposed construction entrance on the R332**. We therefore occupy a different position from many other residents considered within the Applicant's residential amenity assessment. Although we are not among the closest dwellings to the proposed turbines, we are among those most directly affected by the daily operation of the principal construction access.

Throughout the construction period, all construction traffic entering and leaving the site—including Heavy Goods Vehicles, construction plant, staff vehicles and abnormal load deliveries—is expected to pass through this access point. The associated activity has the potential to affect the local residential environment through increased traffic movements, changes to traffic conditions, temporary delays, noise, dust and general disturbance associated with a major infrastructure project.

I acknowledge that the Applicant proposes a range of mitigation measures, including a Construction Traffic Management Plan, traffic marshals, escort vehicles for abnormal loads, road condition surveys and environmental management procedures. These measures are recognised elements of good construction practice and should assist in reducing potential impacts.

Nevertheless, I respectfully submit that the Commission should consider not only whether these measures are appropriate in principle, but also the practical day-to-day experience of those residents living immediately adjacent to the proposed entrance. While construction impacts are temporary, they may persist for a considerable period and have a direct influence on the enjoyment of nearby homes and the safe use of the surrounding road network.

The Applicant's response provides additional explanation of how construction traffic will be managed. However, in my opinion, it does not materially alter the fact that residents living beside the principal access will experience a level of construction activity that is fundamentally different from that experienced elsewhere within the study area.

For this reason, I respectfully request that the Commission give particular consideration to the residential amenity of those households located in the immediate vicinity of the proposed construction entrance when assessing the adequacy of the Applicant's response.

9.6 Construction Impacts on Residential Amenity

The Applicant's February 2026 response concludes that construction-related impacts will be temporary in nature and can be effectively managed through the implementation of the Construction Environmental Management Plan (CEMP), the Construction Traffic Management Plan (CTMP), the Outline Construction Environmental Management Plan (OCEMP) and a range of project-specific mitigation measures.

I acknowledge that these documents describe recognised methods of managing the environmental effects associated with major infrastructure projects and that, where properly implemented, they have the potential to reduce construction-related impacts.

However, having reviewed the Applicant's response, I respectfully submit that the Commission should distinguish between the existence of mitigation measures and the day-to-day experience of those residents living immediately adjacent to the principal construction access.

As previously noted, my family home is located less than **200 metres from the proposed construction entrance on the R332**. Consequently, my family will experience the construction phase in a fundamentally different manner to many other residents within the study area.

While the operational effects of the wind farm are principally determined by the location of individual turbines, the construction phase will be concentrated at the site entrance and along the haul route. Every Heavy Goods Vehicle (HGV), construction plant vehicle, contractor's vehicle and abnormal load delivery entering or leaving the site will pass this location.

Accordingly, the principal construction-related effects experienced by nearby residents are likely to include:

- increased HGV traffic throughout the construction programme;
- abnormal load deliveries associated with turbine components;
- temporary traffic management measures;
- intermittent traffic delays;
- construction noise;
- dust generated during dry weather conditions;
- construction lighting where required;
- reversing alarms and plant movements;
- the general activity associated with a large-scale construction project.

I acknowledge that the Applicant considers these effects to be temporary and capable of being satisfactorily managed through mitigation.

However, temporary impacts should not automatically be regarded as insignificant. The construction period for a wind farm of this scale extends over many months and represents a prolonged period of disruption for those living closest to the principal access.

In my opinion, the Applicant's response focuses primarily on how these impacts will be managed rather than on the cumulative effect that they may have on the day-to-day residential environment experienced by nearby households.

The Commission should therefore consider not only whether appropriate mitigation measures have been proposed, but also whether the overall duration, frequency and intensity of construction activity remains compatible with the reasonable enjoyment of nearby residential properties.

9.7 Traffic-Related Residential Amenity

Although traffic and road safety are considered separately within Chapter 11 of this submission, I believe there are important aspects of traffic that are directly relevant to residential amenity.

For residents living close to the proposed construction entrance, traffic is not simply a transportation issue. It is an integral part of the daily residential environment.

The Applicant's response concludes that the local road network can safely accommodate the proposed construction traffic and that appropriate traffic management measures will minimise disruption.

I acknowledge that detailed traffic assessments have been undertaken and that mitigation measures are proposed.

Nevertheless, as someone who lives immediately adjacent to the proposed access and uses the R332 on a daily basis, I respectfully submit that the practical experience of construction traffic cannot be fully conveyed through traffic modelling or junction capacity assessments alone.

Throughout the construction period, residents living beside the principal access are likely to experience repeated interaction with construction vehicles, temporary traffic management measures and changes to normal traffic conditions.

These effects may include:

- delays entering and leaving residential properties;
- reduced convenience when undertaking routine journeys;
- increased interaction with Heavy Goods Vehicles;
- temporary restrictions associated with abnormal load deliveries;
- changes to the character of the local road environment; and
- increased activity during normal daytime hours.

While each of these effects may be limited when considered individually, their cumulative influence over an extended construction period should not be overlooked when assessing residential amenity.

In my opinion, the Applicant's February 2026 response does not materially alter the fact that residents living immediately adjacent to the principal access will experience a different level of construction activity than those living elsewhere within the study area.

For this reason, I respectfully request that the Commission give particular consideration to the residential experience of those households located adjacent to the proposed construction access when determining whether the overall effects on residential amenity remain acceptable.

9.8 Noise and Residential Amenity

Operational and construction noise were among the principal issues raised during the planning process and have been addressed by the Applicant within both the Environmental Impact Assessment Report (EIAR) and the Applicant's February 2026 Response to Third Party Submissions.

The Applicant concludes that the proposed development will comply with the relevant operational and construction noise criteria and that, following implementation of the proposed mitigation measures, no significant adverse effects on nearby residential properties are predicted.

I acknowledge the detailed acoustic assessment undertaken by the Applicant together with the additional explanation provided in response to submissions. The Applicant has described the methodology adopted, the background noise surveys undertaken, the predicted operational noise environment and the mitigation measures proposed where necessary.

Having reviewed the Applicant's response, however, I respectfully submit that the principal conclusions regarding operational noise remain substantially unchanged from those presented within the original EIAR. The additional information primarily provides further explanation of the assessment methodology rather than materially altering the conclusions reached.

As discussed in **Section 9.3**, I have identified an existing occupied dwelling that existed prior to the submission of the planning application but which does not appear to be identifiable within the Applicant's residential receptor mapping. This dwelling is located approximately **530 metres from Turbines T4 and T5 and approximately 600 metres from Turbine T8**.

Because the operational noise assessment is dependent upon the accurate identification of all existing residential receptors, I respectfully request that the Commission satisfy itself that this dwelling formed part of the Applicant's assessment. If it did not, then the robustness of the

operational noise assessment should be reconsidered for that receptor. If it was assessed, it would assist the transparency of the assessment if this could be clearly demonstrated within the planning documentation.

I do not suggest that this represents an intentional omission. Rather, I believe clarification is warranted because confidence in the conclusions of the noise assessment depends upon confidence in the completeness of the underlying residential baseline.

Finally, while compliance with recognised noise guidance is an important planning consideration, residential amenity should not be determined solely by compliance with numerical limits. Operational noise should also be considered alongside the wider residential environment, including traffic, visual effects, construction activity and the cumulative experience of those living closest to the development.

9.9 Shadow Flicker

Shadow flicker is a recognised environmental effect associated with wind energy development and has been assessed by the Applicant using established modelling methodologies. The Applicant concludes that any properties predicted to experience shadow flicker have been identified and that any effects can be effectively managed through operational mitigation measures where required.

I acknowledge the work undertaken by the Applicant in preparing the shadow flicker assessment and the additional clarification provided within the February 2026 response. Nevertheless, the reliability of any shadow flicker assessment depends fundamentally upon the completeness of the residential receptor dataset used in the modelling process.

As explained in **Section 9.3**, I have identified an existing occupied dwelling, located approximately **530 metres from Turbines T4 and T5 and approximately 600 metres from Turbine T8**, which does not appear to be identifiable within the Applicant's planning documentation. This raises a legitimate question as to whether that dwelling was included within the shadow flicker assessment.

If the dwelling formed part of the assessment, then it would be beneficial for this to be clearly demonstrated within the planning documentation. If it did not, then the Commission should consider whether the conclusions of the shadow flicker assessment fully reflect all potentially affected residential properties.

I acknowledge that the Applicant proposes operational mitigation, including turbine management protocols where necessary, to eliminate unacceptable shadow flicker effects. However, the effectiveness of those measures depends upon all potentially affected dwellings having first been identified during the assessment process.

For this reason, I respectfully request that the Commission satisfy itself that the residential receptor dataset used within the shadow flicker assessment is complete before relying upon the Applicant's conclusions.

9.10 Visual Amenity and Quality of Life

The Applicant has undertaken a comprehensive Landscape and Visual Impact Assessment and concludes that, although the proposed development will result in landscape and visual change, the effects are acceptable having regard to the receiving landscape and the proposed mitigation measures.

I acknowledge the extent of the visual assessment undertaken and recognise that landscape effects are considered separately elsewhere within this submission.

However, residential visual amenity is distinct from the wider landscape assessment. It concerns the effect of the proposed development upon the living environment experienced by those residing within the surrounding area.

The enjoyment of a home extends beyond the dwelling itself and includes views from the property, outdoor amenity areas, the surrounding rural landscape and the overall character of the local environment.

As identified in **Section 9.3**, I have identified an existing occupied dwelling which existed prior to the submission of the planning application but which does not appear to be identifiable

within the Applicant's residential receptor mapping. If that dwelling has not been included within the Landscape and Visual Impact Assessment, then its residential visual amenity may not have been fully considered.

Again, I do not suggest that this represents an intentional omission. Rather, I respectfully request that the Commission satisfy itself that all existing occupied dwellings within the study area have been included in the Applicant's residential baseline before relying upon the conclusions of the visual assessment.

In addition, I respectfully submit that residential visual amenity should not be considered in isolation. For nearby residents, visual effects will be experienced alongside construction traffic, operational traffic, noise, lighting and the general activity associated with the development. The overall quality of the residential environment is therefore influenced by the cumulative interaction of these factors rather than by any single environmental effect.

Accordingly, I respectfully request that the Commission assess residential visual amenity within the broader context of the cumulative living environment experienced by nearby residents.

9.11 Human Health and Quality of Life

The Environmental Impact Assessment Report and the Applicant's February 2026 Response conclude that the proposed development will not give rise to significant adverse effects on human health. This conclusion is based upon the individual assessments of noise, shadow flicker, traffic, air quality, hydrology and other environmental topics, together with the proposed mitigation measures.

I acknowledge the Applicant's assessment and accept that each environmental topic has been considered in accordance with recognised assessment methodologies.

However, I respectfully submit that the protection of human health extends beyond the consideration of individual environmental parameters in isolation. Human health, as recognised by the World Health Organization, encompasses physical, mental and social well-being. Within

the planning context, this includes the overall quality of the residential environment in which people live.

For nearby residents, the effects of a major infrastructure project are experienced collectively rather than individually. Construction traffic, temporary disruption, changes to the landscape, operational infrastructure, noise and other environmental changes all contribute to the overall experience of living within the vicinity of the proposed development.

As a resident living less than 200 metres from the proposed construction entrance, my family's experience of the development will differ from that of residents living elsewhere within the study area. While many of the operational effects may be temporary or individually compliant with recognised standards, the Commission should also consider the overall effect upon the quality of life experienced by those households most directly affected.

I do not suggest that these effects will necessarily result in unacceptable impacts on human health. Rather, I respectfully submit that the Commission should consider whether the Applicant's response adequately addresses the broader concept of residential well-being, particularly during the prolonged construction phase.

9.12 Cumulative Effects on Residential Amenity

One of the principal themes arising from my review of the Applicant's February 2026 Response is that the individual environmental assessments are generally presented independently of one another.

The Applicant concludes that:

- construction traffic can be managed;
- operational noise complies with recognised guidance;
- shadow flicker can be mitigated;
- visual impacts are acceptable;
- construction impacts are temporary; and
- no significant effects on residential amenity are predicted.

Each of these conclusions may be reasonable when considered independently.

However, nearby residents do not experience these effects independently.

Residents experience the combined influence of construction activity, increased traffic, changes to the surrounding landscape, operational infrastructure, temporary disruption and the general activity associated with the development throughout both the construction and operational phases.

For households located close to the proposed construction entrance, these cumulative effects are likely to be particularly evident during the construction period.

While I acknowledge that the Applicant has proposed appropriate mitigation measures for individual environmental topics, I respectfully submit that the Commission should also consider the cumulative interaction of those effects when determining whether residential amenity will be adequately protected.

This cumulative assessment is particularly important because many of the predicted impacts may individually fall below recognised significance thresholds while collectively altering the character of the residential environment experienced by nearby households.

Accordingly, I respectfully request that the Commission assess the combined effect of:

- construction traffic;
- abnormal load deliveries;
- construction noise;
- operational noise;
- visual effects;
- shadow flicker;
- construction lighting;
- temporary disruption to local roads;
- changes to the surrounding landscape; and
- the duration of construction activities

rather than considering each topic solely in isolation.

9.13 Overall Assessment of the Applicant's Response

Having reviewed the Applicant's February 2026 Response together with the supporting technical documentation, I acknowledge that a substantial amount of additional information has been provided regarding residential amenity.

The Applicant has expanded upon the methodologies adopted, clarified aspects of the environmental assessment and described the mitigation measures proposed throughout both the construction and operational phases of the development.

Nevertheless, I respectfully submit that the principal conclusions relating to residential amenity remain substantially unchanged from those presented within the original Environmental Impact Assessment Report.

The additional information primarily provides further explanation and justification for those conclusions rather than materially changing the assessment itself.

I also remain concerned that an existing occupied dwelling located approximately **530 metres from Turbines T4 and T5 and approximately 600 metres from Turbine T8** does not appear to be identifiable within the Applicant's residential receptor dataset. As outlined earlier in this chapter, I respectfully request that the Commission satisfy itself that all existing occupied dwellings were included within the baseline assessments for operational noise, shadow flicker and visual amenity before relying upon the Applicant's conclusions.

While I acknowledge that the Applicant has proposed comprehensive mitigation measures, I respectfully submit that the Commission should distinguish between the effectiveness of proposed mitigation and the completeness of the underlying assessment.

Ultimately, the Commission's task is to determine whether the information now before it provides sufficient confidence that residential amenity and quality of life will be adequately protected throughout the lifetime of the proposed development.

9.14 Matters Remaining for the Commission's Determination

Having considered the Applicant's February 2026 Response and supporting documentation, I respectfully request that the Commission consider the following matters before determining the application:

1. Whether the Applicant's additional information materially changes the assessment of residential amenity or principally provides further explanation of the original conclusions.
2. Whether all existing occupied dwellings within the potential zone of influence of the proposed development have been identified and included within the baseline residential receptor dataset.
3. Whether the operational noise assessment remains representative of all potentially affected residential properties.
4. Whether the shadow flicker assessment includes all existing occupied dwellings.
5. Whether the Landscape and Visual Impact Assessment adequately considers all residential receptors.
6. Whether sufficient weight has been given to the residential experience of households located immediately adjacent to the proposed construction entrance on the R332.
7. Whether the cumulative interaction of construction traffic, construction activity, operational infrastructure, visual effects, noise and shadow flicker has been adequately assessed.
8. Whether the duration and intensity of construction activity remain acceptable having regard to the living conditions of nearby residents.
9. Whether the proposed mitigation measures provide sufficient certainty that residential amenity will be adequately protected throughout construction and operation.
10. Whether the Commission can be satisfied that the Applicant's February 2026 Response has fully addressed the residential amenity concerns raised during the planning process.

9.14 Summary of Principal Residential Amenity Issues

The following table summarises the principal residential amenity issues that, in my respectful opinion, remain relevant following consideration of the Applicant's February 2026 Response to Third Party Submissions.

Topic	Applicant's Position	Observation	Relevant Section
Residential Receptor Dataset	Applicant concludes residential assessments are complete.	An existing occupied dwelling (approximately 530 m from T4 & T5 and 600 m from T8) does not appear to be identifiable within the planning documentation. I respectfully request the Commission confirm that all existing occupied dwellings have been included within the environmental assessments.	Section 9.3
Construction Access	Construction traffic will be managed through the CEMP and CTMP.	My family home is located less than 200 metres from the proposed construction entrance on the R332. Construction activity will therefore be experienced differently from many other residents.	Sections 9.5 & 9.6
Construction Traffic	Temporary impacts considered acceptable following mitigation.	Temporary impacts may nevertheless be experienced over an extended construction period and should be considered having regard to their frequency, duration and cumulative effect.	Sections 9.6 & 9.7

Topic	Applicant's Position	Observation	Relevant Section
Operational Noise	Predicted to comply with ETSU-R-97 and the Wind Energy Development Guidelines.	Compliance with recognised guidance is important but should be considered alongside the wider residential environment and the completeness of the residential receptor assessment.	Section 9.8
Shadow Flicker	Applicant concludes effects can be managed through operational mitigation.	The Commission should satisfy itself that all existing occupied dwellings have been included within the shadow flicker assessment before relying upon its conclusions.	Section 9.9
Visual Amenity	Landscape and visual effects considered acceptable.	Residential visual amenity depends upon the completeness of the residential receptor assessment and should be considered together with the overall quality of the residential environment.	Section 9.10
Human Health	No significant adverse effects predicted.	Human health should be considered in the wider context of residential well-being, recognising the combined influence of construction activity, traffic, noise, landscape change and quality of life.	Section 9.11
Cumulative Effects	Individual assessments conclude effects are acceptable.	Residents experience construction activity, traffic, noise, visual effects and other environmental changes collectively rather than individually.	Section 9.12

Topic	Applicant's Position	Observation	Relevant Section
Overall Assessment	Applicant concludes residential amenity will not be significantly affected.	While acknowledging the Applicant's extensive assessment, I respectfully request that the Commission independently determine whether the additional information materially addresses the concerns raised during the planning process.	Section 9.13

The matters summarised above do not represent new objections to the proposed development. Rather, they identify the principal issues which, in my respectful opinion, remain relevant following my review of the Applicant's February 2026 Response to Third Party Submissions. I respectfully request that An Coimisiún Pleanála consider these matters collectively, together with the detailed observations contained within this chapter, when determining whether the Applicant has adequately demonstrated that residential amenity and quality of life will be protected throughout both the construction and operational phases of the proposed development.

9.15 Personal Statement on Residential Amenity

Throughout this chapter, I have sought to respond objectively to the Applicant's February 2026 Response to Third Party Submissions and to focus on whether the additional information now before An Coimisiún Pleanála adequately addresses the concerns previously raised regarding residential amenity.

As a resident living less than **200 metres from the proposed construction entrance on the R332**, my family and I will experience many aspects of the proposed development differently from residents living elsewhere within the study area. Throughout the construction phase, the principal site access will become part of our daily living environment and we will experience the associated construction traffic, Heavy Goods Vehicle movements, abnormal load deliveries and temporary disruption on a regular basis.

In addition, my family's home is supplied by the **Barnaderg Gortbeg Group Water Scheme**, reinforcing my interest in ensuring that both residential amenity and environmental protection have been fully and robustly assessed.

I fully recognise the importance of renewable energy development and support Ireland's transition towards a low-carbon economy. My observations are therefore not made in opposition to renewable energy as a matter of principle. Rather, they arise from my review of the planning documentation and from my direct experience as a resident living within the immediate vicinity of the proposed development.

For these reasons, I respectfully request that An Coimisiún Pleanála carefully consider the practical experience of those residents most directly affected by the proposed development and be satisfied that the Applicant's additional information has adequately addressed the outstanding issues relating to residential amenity before determining the application.

9.16 Chapter Conclusion

I fully recognise the importance of renewable energy development and acknowledge the considerable work undertaken by the Applicant in assessing the potential effects of the proposed development on nearby residents.

However, having carefully reviewed the Applicant's February 2026 Response, I respectfully remain unconvinced that the additional information materially changes the conclusions reached within the original Environmental Impact Assessment Report regarding residential amenity.

In particular, I respectfully request that the Commission carefully consider:

- the cumulative nature of the impacts experienced by nearby residents;
- the particular circumstances of households located adjacent to the principal construction access on the R332;
- the completeness of the residential receptor dataset underpinning the Applicant's assessments; and
- whether the proposed mitigation measures provide sufficient confidence that residential amenity and quality of life will be protected throughout both the construction and operational phases of the proposed development.

As a resident living in the immediate vicinity of the proposed construction entrance, these issues are of direct relevance to my family. I respectfully ask An Coimisiún Pleanála to carefully consider whether the Applicant's response has fully addressed the outstanding concerns regarding residential amenity before determining the application.

10. Environmental Impact Assessment, Appropriate Assessment and the Scope of the Environmental Assessment

10.1 Introduction

The proposed Cooloo Wind Farm constitutes development requiring both an Environmental Impact Assessment (EIA) and an Appropriate Assessment (AA) under Irish and European law. Consequently, before determining the application, An Coimisiún Pleanála must be satisfied that it has sufficient information to complete both assessments in a lawful, objective and scientifically robust manner.

The purpose of this chapter is not to revisit every environmental topic addressed elsewhere in this submission. Rather, it is to consider whether the Applicant's February 2026 Response to

Third Party Submissions, together with the accompanying technical reports and additional information, has materially addressed the outstanding issues raised during the planning process and whether the Commission now has a sufficiently complete evidential basis upon which to determine the application.

I acknowledge that the Applicant has undertaken extensive additional work since the original application was lodged. This includes further hydrogeological investigations, a Geotechnical Karst Risk Assessment, updated ecological information, additional technical clarification and detailed responses to issues raised by statutory consultees and members of the public.

These additional submissions have undoubtedly expanded the information before the Commission. However, the central issue for the Commission is not whether more information has been submitted, but whether that information materially resolves the planning and environmental issues identified during the consultation process.

10.2 General Observations on the Applicant's Response

Having reviewed the Applicant's February 2026 Response in detail, I acknowledge that considerable effort has been made to respond to the observations received during the planning process.

The response provides additional explanation across a wide range of environmental disciplines including:

- hydrology and hydrogeology;
- geology and karst;
- ecology;
- traffic and transport;
- residential amenity;
- landscape and visual impact;
- cultural heritage;
- engineering design; and
- construction methodology.

In many instances, the Applicant has provided additional explanation of the methodologies adopted, supplementary investigation results and further justification for the conclusions reached within the Environmental Impact Assessment Report.

This additional information is welcomed. Nevertheless, having carefully reviewed the documentation, I respectfully submit that much of the Applicant's response explains why the Applicant continues to support the conclusions of the original assessment rather than materially changing the evidential basis upon which those conclusions were reached. The distinction is important.

The purpose of the present consultation is not simply to confirm that the Applicant remains satisfied with its own assessment.

Rather, it is to enable the Commission to determine whether sufficient objective information is now available to complete its own Environmental Impact Assessment and Appropriate Assessment.

10.3 The Commission's Independent Assessment

The Environmental Impact Assessment process requires the Commission to undertake its own independent assessment of the likely significant environmental effects of the proposed development.

This assessment must consider:

- the Environmental Impact Assessment Report;
- the Natura Impact Statement;
- all Additional Information;
- the Applicant's February 2026 Response;
- observations from statutory consultees;
- submissions from members of the public; and
- all other relevant material placed before the Commission.

Accordingly, the Commission's assessment should extend beyond the conclusions reached by the Applicant.

In my respectful opinion, the Applicant's February 2026 Response should therefore be considered as additional evidence available to assist the Commission in reaching its own conclusions rather than as confirmation that the original assessment remains correct.

10.4 Environmental Assessment of the Whole Project

One issue which I respectfully submit warrants careful consideration is whether the Environmental Impact Assessment and Appropriate Assessment adequately consider the proposed development as a whole.

Throughout the planning process, the Applicant has provided information relating to the proposed wind turbines, access roads, crane hardstands, drainage infrastructure, electrical infrastructure, substation and associated works.

I also note that the location of the on-site substation changed following the pre-application public consultation process.

While I acknowledge that project layouts may evolve during the design process, the relocation of key infrastructure has the potential to influence a range of environmental assessments including hydrology, ecology, landscape, traffic and residential amenity.

Accordingly, I respectfully request that the Commission satisfy itself that the revised layout has been comprehensively assessed and that the environmental consequences of those changes have been fully reflected within the Environmental Impact Assessment and Appropriate Assessment.

In addition, I respectfully request that the Commission consider whether all functionally linked infrastructure necessary for the construction and operation of the proposed wind farm has been assessed in an integrated manner.

This includes the interaction between:

- turbines;
- access tracks;
- drainage infrastructure;
- the on-site electrical substation;

- grid connection infrastructure;
- construction compounds;
- temporary works; and
- any associated electrical infrastructure required for the operation of the development.

My observation is not that these elements necessarily require separate planning applications or that the Applicant has acted improperly. Rather, it is that the Commission should be satisfied that the environmental assessment considers the overall project and its cumulative effects rather than individual elements in isolation.

10.5 Interaction Between Environmental Topics

The Environmental Impact Assessment Report necessarily considers environmental topics under separate chapters.

However, the Commission's assessment should also recognise the interaction between those disciplines.

For example:

- geology influences groundwater;
- groundwater influences ecology;
- ecology influences Appropriate Assessment;
- construction traffic influences residential amenity;
- drainage influences hydrology;
- construction activities influence noise, air quality and human health simultaneously.

Throughout this submission I have sought to consider these interactions rather than each topic individually.

I respectfully request that the Commission adopt the same integrated approach when completing its Environmental Impact Assessment.

10.6 Appropriate Assessment

The Applicant concludes that the proposed development, either individually or in combination with other plans or projects, will not adversely affect the integrity of any European Site.

I acknowledge the detailed Natura Impact Statement and the additional ecological information submitted throughout the planning process.

Appropriate Assessment requires the Commission to be satisfied, beyond reasonable scientific doubt, that the proposed development will not adversely affect the integrity of European Sites, having regard to their conservation objectives.

Accordingly, I respectfully request that the Commission carefully consider whether the Applicant's February 2026 Response has fully addressed the issues raised during consultation regarding:

- hydrological pathways;
- ecological connectivity;
- construction-stage mitigation;
- cumulative effects;
- monitoring;
- residual uncertainty.

10.7 Reliance on Mitigation

A recurring theme throughout the Applicant's Response is reliance upon:

- Construction Environmental Management Plans;
- ecological supervision;
- groundwater monitoring;
- pollution prevention measures;
- engineering design;
- traffic management;
- operational monitoring.

These represent recognised good practice and I acknowledge their importance.

Nevertheless, mitigation measures should complement a robust environmental assessment rather than compensate for uncertainty within that assessment.

Accordingly, I respectfully request that the Commission distinguish between:

- demonstrating that significant effects have been fully assessed; and
- demonstrating how those effects will be managed during construction and operation.

10.8 Matters Remaining for the Commission's Determination

I respectfully request that the Commission consider the following matters:

1. Whether the Applicant's February 2026 Response materially changes the evidence before the Commission or principally reinforces the original assessment.
2. Whether sufficient information is now available to enable the Commission to complete its own Environmental Impact Assessment.
3. Whether sufficient information is now available to complete an Appropriate Assessment beyond reasonable scientific doubt.
4. Whether the revised project layout, including the relocated on-site substation, has been fully assessed.
5. Whether the Environmental Impact Assessment adequately considers the proposed development as a whole, including all functionally linked infrastructure.
6. Whether interactions between environmental topics have been fully considered.
7. Whether cumulative environmental effects have been adequately assessed.
8. Whether reliance upon construction-stage mitigation leaves any material uncertainty unresolved.
9. Whether the Commission can be satisfied that the Applicant's additional information has fully addressed the principal issues raised throughout the planning process.

10.9 Conclusion

I acknowledge the considerable work undertaken by the Applicant in preparing the Environmental Impact Assessment Report, the Natura Impact Statement and the extensive additional information submitted during the planning process.

The Applicant's February 2026 Response has provided valuable clarification across a broad range of environmental disciplines and has assisted in explaining the basis upon which the Applicant continues to support the proposed development.

However, the central question before the Commission is not whether the Applicant remains satisfied with its own assessment, but whether the information now before the Commission provides a sufficiently complete, objective and scientifically robust basis upon which An Coimisiún Pleanála can complete its own Environmental Impact Assessment and Appropriate Assessment.

For the reasons outlined throughout this submission, I respectfully request that the Commission carefully consider whether the additional information has materially resolved the outstanding environmental issues identified during the planning process before determining the application

11. Traffic, Transportation and Road Safety.

11.1 Introduction

Traffic and transportation formed one of the principal issues raised throughout the planning process. The proposed development involves the construction of a large-scale wind farm requiring the delivery of substantial quantities of construction materials, heavy construction plant, turbine components, abnormal loads and associated traffic over an extended construction period.

The Applicant's Environmental Impact Assessment Report (EIAR) concludes that the surrounding road network can safely accommodate the proposed development following the implementation of appropriate mitigation measures, including a Construction Traffic Management Plan (CTMP), temporary traffic management measures and road improvement works where required.

The Applicant's February 2026 Response to Third Party Submissions provides additional explanation regarding construction traffic, abnormal load deliveries, route selection and traffic management arrangements.

I acknowledge the work undertaken by the Applicant and the additional information now available to the Commission.

However, the purpose of this chapter is to consider whether the Applicant's response has materially addressed the concerns raised during the planning process and whether the Commission can be satisfied that the proposed development can be constructed without giving rise to unacceptable impacts upon road safety, residential amenity and the operation of the local road network.

As a resident living **less than 200 metres from the proposed construction entrance on the R332**, my family will experience the effects of construction traffic on a daily basis throughout the construction period. My observations are therefore informed both by my review of the planning documentation and by my long-standing familiarity with the local road network.

11.2 General Response to the Applicant's Submission

Having reviewed the Applicant's February 2026 Response, I acknowledge that considerable additional explanation has been provided regarding:

- construction traffic volumes;
- abnormal load deliveries;
- junction assessments;
- swept path analysis;
- traffic management proposals;
- road improvements;
- mitigation measures.

These responses assist in understanding how the Applicant proposes to manage construction traffic. However, I respectfully submit that the additional information largely explains how impacts will be managed rather than materially changing the conclusions reached within the original Traffic and Transport Assessment.

The Commission must therefore determine whether the proposed mitigation measures provide sufficient confidence that road safety and residential amenity will remain adequately protected throughout the construction period.

11.3 My Particular Circumstances

Unlike many residents considered within the Applicant's assessment, my family home is located **less than 200 metres from the proposed construction entrance on the R332**.

Consequently, every phase of the construction programme will directly affect our daily use of the local road network.

Throughout the construction period we are likely to experience:

- frequent Heavy Goods Vehicle (HGV) movements;
- construction plant entering and leaving the site;
- abnormal load deliveries;
- temporary traffic management measures;
- increased traffic congestion during peak construction periods;
- changes to the character of the local road environment;
- increased noise associated with heavy vehicle movements; and
- disruption to normal daily journeys.

While each of these impacts may individually be regarded as temporary, they will be experienced repeatedly over the duration of the construction programme.

Accordingly, I respectfully request that the Commission give particular consideration to residents living adjacent to the proposed construction entrance when assessing the adequacy of the Applicant's response.

11.4 Construction Traffic

The Applicant concludes that construction traffic can be accommodated safely through implementation of the Construction Traffic Management Plan.

I acknowledge that the CTMP includes recognised measures such as:

- delivery scheduling;
- traffic marshals;
- escort vehicles;

- communication procedures;
- temporary traffic management;
- road condition surveys.

These measures represent recognised good practice.

However, I respectfully submit that the Commission should distinguish between:

- proposing mitigation measures; and
- demonstrating that those measures will adequately protect nearby residents throughout a lengthy construction programme.

For residents living immediately adjacent to the proposed site entrance, construction traffic represents more than a transportation issue.

It becomes part of the daily residential environment.

11.5 Abnormal Load Deliveries

The delivery of turbine components represents one of the most significant traffic operations associated with the proposed development.

The Applicant has assessed the proposed abnormal load route and concludes that deliveries can be undertaken safely using temporary traffic management measures. I acknowledge the detailed route assessment undertaken.

Nevertheless, abnormal loads differ significantly from routine HGV movements.

Their passage may require:

- temporary road closures;
- traffic escorts;
- removal or temporary relocation of roadside infrastructure;
- temporary restrictions on other road users.

Accordingly, I respectfully request that the Commission carefully consider the practical implications of abnormal load deliveries for residents living close to the proposed entrance and along the delivery route.

11.6 Road Safety

Road safety should remain the Commission's primary consideration when assessing the transportation aspects of the proposed development.

While the Applicant concludes that the local road network can safely accommodate the proposed development, I respectfully request that the Commission consider:

- school traffic;
- agricultural vehicles;
- pedestrians;
- cyclists;
- horse riders;
- local residents;
- emergency services.

The rural road network serves many different users whose needs extend beyond vehicle capacity assessments.

11.7 Traffic Surveys

The Applicant relies upon traffic surveys undertaken to establish existing traffic conditions.

During the planning process concerns were raised that **certain traffic surveys were undertaken during July**, when local schools were on summer holidays and normal traffic conditions may not have been fully represented.

I acknowledge that traffic surveys are undertaken in accordance with recognised methodologies.

However, I respectfully request that the Commission consider whether the survey periods accurately reflect typical traffic conditions throughout the year, particularly during school term when the R332 experiences additional local traffic associated with school transport, commuting and community activities.

If traffic surveys were undertaken during a period that does not represent normal operating conditions, the Commission should consider whether this has any bearing on the assessment of construction traffic impacts.

11.8 Cumulative Traffic Effects

Traffic should not be considered in isolation.

Construction traffic also influences:

- residential amenity;
- noise;
- air quality;
- road safety;
- quality of life.

For residents living beside the proposed entrance these effects will occur simultaneously.

Accordingly, I respectfully request that the Commission consider the cumulative effect of prolonged construction traffic rather than assessing each individual effect separately.

11.9 Overall Assessment of the Applicant's Response

Having reviewed the Applicant's February 2026 Response, I acknowledge the considerable amount of additional information provided regarding traffic management and construction logistics.

Nevertheless, I respectfully submit that the additional information primarily explains how construction traffic will be managed rather than materially changing the conclusions of the original assessment.

As a resident living less than 200 metres from the proposed construction entrance, I respectfully request that the Commission consider not only whether the proposed mitigation measures are technically appropriate, but also whether they adequately protect the day-to-day living environment of those households located immediately adjacent to the principal construction access.

11.10 Matters Remaining for the Commission's Determination

I respectfully request that the Commission consider the following matters:

1. Whether the Applicant's February 2026 Response materially changes the original traffic assessment or principally provides additional explanation.
2. Whether the Construction Traffic Management Plan provides sufficient certainty that road safety will be maintained throughout construction.
3. Whether traffic surveys undertaken during July accurately represent normal traffic conditions on the R332.
4. Whether particular consideration has been given to residents living adjacent to the proposed construction entrance.
5. Whether abnormal load deliveries have been fully assessed having regard to their frequency, duration and practical implications for local road users.
6. Whether cumulative traffic effects on residential amenity have been adequately assessed.
7. Whether the interaction between traffic, road safety, noise and residential amenity has been fully considered.

11.11 Chapter Conclusion

I acknowledge the considerable work undertaken by the Applicant in assessing traffic and transportation issues and the additional information submitted in response to concerns raised during the planning process.

However, the central issue before the Commission is whether the Applicant's February 2026 Response provides sufficient evidence to demonstrate that the proposed development can be constructed without giving rise to unacceptable impacts on road safety, the operation of the local road network and the residential amenity of those living closest to the proposed construction entrance.

As a resident whose family home is located less than **200 metres from the proposed entrance on the R332**, I respectfully request that An Coimisiún Pleanála give particular consideration to the practical experience of residents who will interact with construction traffic on a daily basis throughout the construction period and be satisfied that the proposed mitigation measures

are sufficient to protect both road safety and residential amenity before determining the application.

12. Biodiversity, Ecology and Nature Conservation

12.1 Introduction

Biodiversity and ecological protection are central considerations in the assessment of the proposed Cooloo Wind Farm. The proposed development is located within a rural landscape comprising agricultural land, hedgerows, watercourses, peat soils and semi-natural habitats that support a range of protected and notable species. The Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and supporting ecological assessments recognise the ecological sensitivity of the receiving environment and assess the potential effects of the proposed development on habitats, birds, bats, mammals, aquatic ecology and designated conservation sites.

The Applicant's February 2026 Response to Third Party Submissions provides further explanation of the ecological surveys undertaken, the methodologies applied and the mitigation measures proposed. I acknowledge the significant amount of ecological work completed by the Applicant and the additional information submitted during the planning process.

The purpose of this chapter is not to repeat the ecological objections previously made by local residents. Rather, it is to consider whether the Applicant's February 2026 Response has materially addressed the biodiversity issues raised during the planning process and whether the Commission now has sufficient information to conclude that biodiversity, protected species and designated sites will be adequately protected throughout both the construction and operational phases of the proposed development.

Throughout this chapter I respectfully request that biodiversity be considered alongside the wider environmental issues discussed elsewhere in this submission, particularly hydrology, geology and Appropriate Assessment, as ecological receptors are closely linked to these environmental disciplines.

12.2 General Observations on the Applicant's Response

Having reviewed the Applicant's February 2026 Response, I acknowledge that additional ecological information has been provided regarding habitats, birds, bats, protected species, ecological mitigation, monitoring and cumulative ecological effects.

The Applicant has expanded upon the original ecological assessment by providing additional clarification of survey methodologies, ecological interpretation and proposed mitigation measures. This additional information is welcomed.

However, in my respectful opinion, much of the Applicant's response explains why the original ecological assessment remains valid rather than materially altering the conclusions reached within the Environmental Impact Assessment Report and Natura Impact Statement.

The Commission must therefore determine whether the additional information provides sufficient objective evidence to conclude that biodiversity interests will be adequately protected or whether the response principally reinforces the Applicant's original assessment.

12.3 Ecological Sensitivity of the Receiving Environment

The Applicant acknowledges that the proposed development is situated within a landscape containing a range of ecological features including agricultural grassland, hedgerows, drainage ditches, watercourses, peat soils and semi-natural habitats that provide ecological connectivity across the wider landscape.

Although many of the habitats within the site are assessed as being of relatively common conservation value, they nevertheless perform important ecological functions by providing habitat, foraging opportunities and movement corridors for birds, bats and other wildlife.

The ecological value of these habitats should therefore not be assessed solely on the basis of their individual conservation status but also by reference to their role within the wider ecological network.

In addition, the ecological sensitivity of the site cannot be separated from the hydrological environment discussed in Chapter 8. Groundwater, surface water, drainage pathways and peatland conditions influence habitat quality and ecological function. Consequently, the

Commission should consider the interaction between hydrology and ecology when assessing the adequacy of the Applicant's response.

12.4 Ornithology (Birds)

Birds were one of the principal ecological issues raised during the planning process.

The Applicant undertook extensive ornithological surveys and concludes that the proposed development will not result in significant adverse effects on bird populations following implementation of the proposed mitigation measures.

I acknowledge the comprehensive survey programme undertaken and the additional explanation provided in the Applicant's February 2026 Response.

However, I respectfully submit that the Commission should distinguish between additional explanation of the assessment and material changes to the assessment itself.

The Applicant's response provides further justification for the conclusions reached within the original EIAR but does not substantially alter those conclusions.

Accordingly, I respectfully request that the Commission carefully consider whether:

- the survey programme remains representative of current conditions;
- collision risk has been fully assessed;
- displacement effects have been adequately evaluated;
- cumulative effects with other existing, permitted and proposed wind energy developments have been fully considered;
- post-construction monitoring will be sufficient to verify the predicted impacts.

12.5 Bats

The Applicant has undertaken extensive bat activity surveys and concludes that predicted impacts can be effectively managed through mitigation measures, including operational curtailment where appropriate.

I acknowledge the detailed assessment undertaken. Operational curtailment is a recognised and effective mitigation measure in many wind farm developments.

However, I respectfully submit that mitigation should complement a robust ecological assessment rather than compensate for uncertainty regarding the magnitude of likely effects.

The Commission should therefore satisfy itself that:

- bat activity surveys adequately represent the site;
- important commuting routes have been identified;
- hedgerows and linear landscape features have been appropriately considered;
- operational curtailment will provide sufficient certainty that significant adverse effects will not occur.

12.6 Habitats and Protected Species

The Applicant concludes that habitat loss associated with the proposed development is limited and that ecological mitigation will avoid significant adverse effects on protected habitats and species.

I acknowledge this assessment.

However, habitats should not be considered independently of the wider environmental conditions that support them.

Changes to groundwater, surface water, drainage patterns and construction activities may indirectly influence habitat quality, ecological connectivity and species distribution.

Accordingly, I respectfully request that the Commission consider the interaction between habitat protection, hydrology and construction activities when assessing the overall ecological effects of the proposed development.

12.7 Biodiversity and Hydrology

As discussed in Chapter 8, groundwater and surface water resources represent important environmental receptors throughout the proposed development area.

The ecological assessments rely upon the conclusion that construction activities will not give rise to significant deterioration in water quality or hydrological conditions.

Accordingly, the ecological conclusions are intrinsically linked to the conclusions reached in relation to hydrology and hydrogeology.

Should the Commission determine that additional uncertainty remains regarding groundwater protection or drainage impacts, it should also consider whether those uncertainties have implications for the ecological assessment.

For this reason, biodiversity and hydrology should not be considered in isolation.

12.8 Appropriate Assessment

The Applicant concludes that the proposed development will not adversely affect the integrity of any European Site.

I acknowledge the extensive Natura Impact Statement together with the additional ecological information submitted during the planning process.

Appropriate Assessment requires complete, precise and definitive findings capable of removing reasonable scientific doubt regarding the absence of adverse effects on the integrity of European Sites.

Accordingly, I respectfully request that the Commission satisfy itself that:

- ecological pathways have been fully identified;
- hydrological pathways have been comprehensively assessed;
- cumulative effects have been adequately considered;
- mitigation measures are sufficiently certain;
- no reasonable scientific doubt remains.

12.9 Reliance upon Mitigation

A recurring feature of the Applicant's February 2026 Response is reliance upon ecological mitigation measures including:

- ecological supervision;
- habitat protection;

- Construction Environmental Management Plans;
- monitoring programmes;
- operational bat curtailment;
- pollution prevention measures.

These represent recognised good practice. Nevertheless, mitigation should complement a robust ecological assessment rather than compensate for uncertainty within that assessment.

12.10 Overall Assessment of the Applicant's Response

Having reviewed the Applicant's February 2026 Response, I acknowledge the considerable amount of additional ecological information submitted.

However, I respectfully submit that the additional information principally provides further explanation and technical justification for the conclusions reached within the original Environmental Impact Assessment Report rather than materially changing those conclusions.

The Commission must therefore determine whether the information now before it provides sufficient confidence that biodiversity and ecological interests will remain adequately protected throughout the construction and operational phases of the proposed development.

12.11 Matters Remaining for the Commission's Determination

I respectfully request that the Commission consider:

1. Whether the Applicant's February 2026 Response materially changes the ecological assessment or principally reinforces the original conclusions.
2. Whether cumulative ecological effects have been fully assessed.
3. Whether bird collision and displacement effects have been adequately evaluated.
4. Whether bat activity and mitigation have been sufficiently assessed.
5. Whether ecological connectivity has been fully considered.
6. Whether interactions between hydrology and ecology have been comprehensively assessed.
7. Whether the proposed mitigation measures provide sufficient certainty.
8. Whether the Commission can complete the Appropriate Assessment beyond reasonable scientific doubt.

12.12 Chapter Conclusion

I acknowledge the substantial ecological assessment undertaken by the Applicant and the considerable additional information submitted throughout the planning process.

However, the purpose of the present consultation is not simply to confirm that the Applicant remains satisfied with its original ecological assessment. Rather, it is to assist An Coimisiún Pleanála in determining whether the additional information now before it provides a sufficiently complete and scientifically robust basis upon which to conclude that biodiversity, protected species, ecological connectivity and European Sites will be adequately protected.

For the reasons outlined throughout this chapter, I respectfully request that the Commission carefully consider whether the Applicant's February 2026 Response has fully resolved the outstanding biodiversity issues identified during the planning process before determining the application.

13. Cultural Heritage, Archaeology and Historic Landscape

13.1 Introduction

The protection of archaeological heritage, architectural heritage and the historic landscape forms an important component of the planning process and is a key consideration in determining whether a proposed development represents proper planning and sustainable development.

The Applicant's Environmental Impact Assessment Report (EIAR), Cultural Heritage Assessment and the February 2026 Response to Third Party Submissions conclude that the proposed development can proceed without giving rise to significant adverse effects on known archaeological monuments, architectural heritage or the wider historic environment following the implementation of appropriate mitigation measures.

I acknowledge the detailed cultural heritage assessment undertaken by the Applicant together with the additional information submitted during the planning process.

The purpose of this chapter is not to repeat observations previously made regarding cultural heritage. Rather, it is to consider whether the Applicant's February 2026 Response has materially addressed the issues raised during the planning process and whether the Commission now has sufficient information to conclude that cultural heritage will be adequately protected.

13.2 General Observations on the Applicant's Response

Having reviewed the Applicant's February 2026 Response, I acknowledge that additional clarification has been provided regarding:

- archaeological assessment;
- historic landscape character;
- construction methodology;
- archaeological mitigation;
- monitoring proposals;
- protection of recorded monuments.

The Applicant has provided additional explanation of the methodologies adopted and the mitigation measures proposed. This additional information is welcomed.

However, in my respectful opinion, much of the response provides further explanation of the original assessment rather than materially altering the conclusions reached within the EIAR.

The Commission must therefore determine whether the additional information now before it provides sufficient confidence that archaeological and cultural heritage interests will be adequately protected.

13.3 Archaeological Heritage

The Applicant concludes that the proposed development avoids direct impacts upon recorded archaeological monuments and that appropriate mitigation measures will ensure that archaeological heritage is protected during construction. I acknowledge these conclusions.

However, archaeological resources are often not fully understood until construction begins.

Ground disturbance associated with:

- turbine foundations;
- crane hardstands;
- access roads;
- cable trenches;
- drainage works;
- construction compounds;

has the potential to encounter previously unidentified archaeological material.

For this reason, I respectfully request that the Commission be satisfied that the proposed programme of archaeological monitoring is sufficiently robust to identify and protect any previously unknown archaeological remains that may be encountered during construction.

13.4 Historic Landscape

Cultural heritage extends beyond recorded monuments and includes the historic landscape within which archaeological and architectural features are experienced.

The Applicant concludes that the proposed development will not give rise to unacceptable impacts on the historic landscape.

I acknowledge this assessment.

However, I respectfully submit that the Commission should consider the interaction between:

- landscape character;
- archaeological heritage;
- cultural setting;
- visual change.

The significance of heritage assets is often influenced not only by their physical preservation but also by their landscape context and setting.

Accordingly, I respectfully request that the Commission consider whether the cumulative interaction of landscape change and cultural heritage has been fully reflected in the Applicant's assessment.

13.5 Construction Impacts and Mitigation

The Applicant proposes a range of mitigation measures including:

- archaeological monitoring;
- exclusion zones;
- construction supervision;
- recording procedures;
- preservation where appropriate.

These represent recognised good practice.

However, as discussed elsewhere throughout this submission, mitigation should complement a robust environmental assessment rather than compensate for uncertainty.

The Commission should therefore distinguish between:

- demonstrating that archaeological impacts have been fully assessed; and
- demonstrating how unforeseen discoveries will be managed during construction.

6.6 Overall Assessment of the Applicant's Response

Having reviewed the Applicant's February 2026 Response, I acknowledge the considerable work undertaken in relation to cultural heritage.

Nevertheless, I respectfully submit that the additional information primarily explains and reinforces the conclusions of the original assessment rather than materially altering those conclusions.

The Commission must therefore determine whether the information now before it provides sufficient confidence that archaeological heritage, architectural heritage and the wider historic landscape will be adequately protected throughout the construction and operational phases of the proposed development.

13.7 Matters Remaining for the Commission's Determination

I respectfully request that the Commission consider:

1. Whether the Applicant's additional information materially changes the cultural heritage assessment.
2. Whether archaeological monitoring is sufficient.
3. Whether construction impacts have been fully assessed.
4. Whether the historic landscape has been adequately considered.
5. Whether cumulative effects with landscape change have been fully assessed.
6. Whether mitigation measures provide sufficient certainty.

13.8 Chapter Conclusion

I acknowledge the substantial cultural heritage assessment undertaken by the Applicant and the additional information submitted throughout the planning process.

However, I respectfully request that An Coimisiún Pleanála satisfy itself that the Applicant's February 2026 Response has fully addressed the outstanding cultural heritage issues and that appropriate safeguards are in place to ensure the protection of archaeological and historic landscape interests throughout the lifetime of the proposed development.

14. Climate, Carbon Balance and Sustainable Development

14.1 Introduction

Ireland has adopted ambitious national and European commitments to reduce greenhouse gas emissions, increase renewable electricity generation and transition towards a low-carbon economy. Wind energy has an important role to play in achieving these objectives. I fully recognise and support these national climate ambitions.

The proposed Cooloo Wind Farm has the potential to contribute to renewable electricity generation and to assist Ireland in meeting its climate and energy obligations.

However, the planning process requires that climate benefits be considered alongside environmental protection, residential amenity, biodiversity, landscape, water resources and the wider principles of proper planning and sustainable development.

The purpose of this chapter is therefore to consider whether the Applicant's February 2026 Response materially alters the climate assessment presented within the original EIAR and how those climate benefits should be balanced against the environmental considerations discussed elsewhere within this submission.

14.2 Climate Benefits of the Proposed Development

The Applicant concludes that the proposed development will make a positive contribution towards:

- renewable electricity generation;
- national climate targets;
- reduction of greenhouse gas emissions;
- energy security;
- decarbonisation of the electricity sector.

I acknowledge these anticipated benefits and recognise their importance within national planning policy. These benefits represent a significant positive aspect of the proposed development.

14.3 Carbon Balance

The Applicant has assessed the likely carbon implications associated with construction and operation.

These include:

- construction emissions;
- transport emissions;
- operational carbon savings;
- the long-term contribution of renewable electricity generation.

I acknowledge that, over the operational lifetime of the development, significant carbon savings are anticipated.

However, I respectfully submit that carbon benefits should be considered as one component of the overall planning balance rather than the sole determining factor.

14.4 Climate and Sustainable Development

Sustainable development requires the integration of environmental, social and economic considerations. Renewable energy forms an important component of sustainable development.

However, sustainable development also requires:

- protection of biodiversity;
- protection of groundwater;
- safeguarding residential amenity;
- protection of landscape;
- conservation of cultural heritage;
- proper environmental assessment.

Accordingly, climate benefits should be considered alongside the wider environmental considerations discussed throughout this submission.

14.5 General Response to the Applicant's Submission

Having reviewed the Applicant's February 2026 Response, I acknowledge the additional explanation provided regarding climate policy and renewable energy benefits.

However, the additional information does not materially alter the climate conclusions presented within the original EIAR.

Rather, it reinforces the Applicant's view that the proposed development will make a positive contribution towards Ireland's renewable energy objectives. I accept that conclusion.

The question before the Commission is therefore not whether the project has climate benefits, but whether those benefits have been appropriately balanced against the environmental considerations identified elsewhere within the planning process.

14.6 The Overall Planning Balance

In determining this application, the Commission must undertake an overall planning balance. That balance includes:

Benefits

- Renewable electricity generation.
- Climate action.
- Energy security.
- National policy objectives.

Potential Effects

- Hydrology and groundwater.
- Biodiversity.
- Residential amenity.
- Landscape.
- Traffic.
- Cultural heritage.
- Construction impacts.
- Cumulative environmental effects.

The Commission's role is to determine whether, having regard to all of these considerations, the proposed development represents proper planning and sustainable development.

14.7 Matters Remaining for the Commission's Determination

I respectfully request that the Commission consider:

1. Whether the climate benefits have been appropriately balanced against the environmental effects.
2. Whether sustainable development has been assessed holistically.
3. Whether the Applicant's February 2026 Response materially changes the planning balance.
4. Whether the cumulative environmental effects remain acceptable.
5. Whether the proposed development represents proper planning and sustainable development.

14.8 Chapter Conclusion

I acknowledge the important contribution that the proposed development could make towards Ireland's renewable energy and climate objectives.

My submission is not intended to diminish the importance of those objectives or to oppose renewable energy development in principle.

Rather, I respectfully submit that the Commission must balance these acknowledged climate benefits against the environmental and community considerations discussed throughout this submission.

For that reason, I respectfully request that An Coimisiún Pleanála determine whether the Applicant's February 2026 Response has demonstrated that the proposed development can achieve its climate objectives while also satisfying the wider requirements of proper planning and sustainable development.

15. Planning Policy, Sustainable Development and the Overall Planning Balance

15.1 Introduction

The proposed Cooloo Wind Farm must be considered within the context of Ireland's national commitment to increasing renewable electricity generation, reducing greenhouse gas emissions and transitioning towards a low-carbon economy.

I fully acknowledge the importance of these national objectives and recognise the significant role that renewable energy developments will continue to play in meeting Ireland's climate obligations.

However, national planning policy does not provide unconditional support for every renewable energy proposal.

Rather, the planning system requires each proposal to be assessed on its individual merits having regard to the principles of proper planning and sustainable development, environmental protection, public participation and the long-term interests of local communities.

The purpose of this chapter is therefore not to revisit the technical matters discussed elsewhere within this submission. Instead, it is to consider whether, having regard to all of the information now before An Coimisiún Pleanála, including the Applicant's February 2026 Response to Third Party Submissions, the proposed development has demonstrated compliance with the wider principles of proper planning and sustainable development.

15.2 National Policy Supports Renewable Energy—but not at Any Cost

Ireland's planning policy strongly supports renewable energy development. I acknowledge this support and fully recognise the national need to increase renewable electricity generation in response to climate change and energy security objectives.

However, national planning policy also requires that renewable energy developments:

- protect residential amenity;
- protect water resources;
- safeguard biodiversity;
- avoid unacceptable environmental effects;
- comply with the requirements of Environmental Impact Assessment and Appropriate Assessment;
- integrate with the receiving landscape;
- represent proper planning and sustainable development.

Accordingly, support for renewable energy should not be interpreted as creating a presumption that every proposed wind farm should receive planning permission.

The Commission must instead determine whether this particular proposal, in this particular location, satisfies the statutory planning tests.

15.3 Has the Applicant's Response Materially Changed the Planning Position?

Throughout this submission I have acknowledged the considerable amount of additional information submitted by the Applicant.

The February 2026 Response represents a substantial body of work and provides additional explanation across numerous environmental disciplines. This additional information is welcomed.

However, one consistent observation has emerged throughout my review of the documentation. In many instances, the Applicant's response explains why the Applicant continues to support the conclusions of the original Environmental Impact Assessment Report rather than materially changing those conclusions. This distinction is important.

The Commission's task is not to determine whether the Applicant remains satisfied with its own assessment. Rather, it is to determine whether the additional information now before it materially resolves the issues raised during the planning process and enables the Commission to reach its own independent planning judgement.

15.4 The Overall Planning Balance

The Commission is required to undertake a balancing exercise.

On one side are the acknowledged national benefits associated with renewable electricity generation, climate action and energy security.

On the other side are the potential environmental and community effects associated with the proposed development.

These include:

- groundwater protection;
- biodiversity;
- residential amenity;
- road safety;
- construction impacts;

- landscape;
- cumulative effects;
- the adequacy of mitigation;
- long-term environmental management.

No single issue should necessarily determine the application.

Rather, the Commission should consider the cumulative significance of all relevant planning considerations before determining whether the proposal represents proper planning and sustainable development.

15.5 The Importance of Independent Assessment

Throughout the planning process the Applicant has understandably sought to demonstrate that the proposed development complies with all relevant planning and environmental requirements.

The Applicant's consultants have provided extensive technical assessments and additional clarification in response to observations received. These submissions are an important part of the planning process.

However, the Commission is not required to adopt the Applicant's conclusions. The Commission must undertake its own independent assessment of:

- the evidence;
- the environmental effects;
- the adequacy of mitigation;
- the remaining uncertainties;
- the planning merits of the proposal.

Accordingly, I respectfully request that the Commission critically evaluate whether the additional information submitted genuinely changes the evidential basis of the application or principally reinforces the Applicant's original conclusions.

15.6 Proper Planning and Sustainable Development

Having reviewed all of the information now before the Commission, I respectfully submit that several matters continue to warrant careful consideration.

These include:

- protection of the Barnaderg Gortbeg Group Water Scheme;
- hydrology and hydrogeology;
- biodiversity and ecological connectivity;
- residential amenity;
- traffic and road safety;
- cumulative environmental effects;
- the completeness of the residential receptor assessment;
- the interaction between environmental disciplines;
- reliance upon construction-stage mitigation.

Each of these issues has been discussed separately throughout this submission.

However, in my respectful opinion, the Commission should now consider them collectively when determining whether the proposed development satisfies the requirements of proper planning and sustainable development.

15.7 Matters Remaining for the Commission's Consideration

Having regard to all of the information before the Commission, I respectfully request that the following matters be carefully considered:

1. Has the Applicant's February 2026 Response materially addressed the principal issues raised during the planning process?
2. Can the Commission complete its Environmental Impact Assessment and Appropriate Assessment with sufficient confidence?
3. Have the cumulative environmental effects of the proposed development been fully assessed?
4. Does the proposed mitigation provide sufficient certainty regarding long-term environmental protection?
5. Have the interests of nearby residents been adequately protected?

6. Have the interactions between hydrology, biodiversity, residential amenity and construction activities been comprehensively assessed?
7. Does the proposed development, viewed as a whole, represent proper planning and sustainable development?

15.8 Chapter Conclusion

I fully acknowledge the national importance of renewable energy development and the considerable work undertaken by the Applicant in preparing the planning application and responding to the observations received during the planning process.

My submission is not intended to oppose renewable energy development in principle. Rather, it is intended to assist An Coimisiún Pleanála in determining whether the additional information submitted by the Applicant has materially addressed the outstanding planning and environmental issues identified during the planning process.

Throughout this submission I have acknowledged the extensive investigations undertaken by the Applicant while also identifying a number of matters which, in my respectful opinion, continue to warrant careful consideration.

Ultimately, the decision before the Commission is not whether renewable energy development is desirable in principle. It is whether this particular proposal, at this particular location, has demonstrated that it can proceed in a manner consistent with the principles of proper planning and sustainable development.

For the reasons outlined throughout this submission, I respectfully request that An Coimisiún Pleanála carefully consider whether the Applicant's February 2026 Response has fully addressed the outstanding planning issues before determining the application.

16. Overall Conclusions

16.1 Introduction

This submission has been prepared in response to the Applicant's **February 2026 Response to Third Party Submissions** and the additional information submitted during the course of the planning application for the proposed **Cooloo Wind Farm**.

Its purpose has not been to repeat the observations made during the original statutory consultation process, nor to oppose renewable energy development as a matter of principle. Rather, it has sought to consider whether the additional information now before **An Coimisiún Pleanála** has materially addressed the planning, environmental and technical issues raised throughout the assessment of this application.

Throughout this submission I have sought to adopt a balanced, objective and evidence-based approach. Where appropriate, I have acknowledged the considerable work undertaken by the Applicant and the significant volume of technical information submitted in support of the application. Equally, where I believe that important planning or environmental issues remain unresolved or require further consideration, I have endeavoured to explain those concerns in a measured and reasoned manner.

16.2 The Applicant's February 2026 Response

The Applicant's February 2026 Response represents a substantial body of work and provides additional technical information and clarification across a wide range of environmental disciplines.

The additional investigations, technical reports and explanatory material have expanded the information available to the Commission and have assisted in explaining the basis upon which the Applicant continues to support the proposed development.

However, having reviewed the documentation in detail, I respectfully consider that much of the additional material reinforces and explains the conclusions of the original planning application rather than materially changing the evidential basis upon which those conclusions were reached.

Throughout this submission I have consistently distinguished between **additional explanation** and **additional objective evidence**, as this distinction is central to the Commission's independent assessment of the application.

16.3 The Importance of an Integrated Assessment

One of the recurring themes throughout this submission has been the importance of considering the proposed development as a whole rather than as a series of separate technical disciplines. Hydrology, hydrogeology, biodiversity, residential amenity, traffic, cultural heritage, climate, landscape and human health are closely interconnected. The conclusions reached in one environmental discipline frequently influence the conclusions reached in another.

Accordingly, the Environmental Impact Assessment and Appropriate Assessment should not simply consider each topic individually but should also examine the cumulative interaction between environmental receptors and the overall effect of the proposed development on the receiving environment.

16.4 Balancing National and Local Interests

I fully acknowledge Ireland's commitment to increasing renewable electricity generation and recognise the important contribution that wind energy will continue to make towards national climate action and energy security objectives.

However, the planning system requires that these important national objectives be balanced against the need to protect local communities, environmental resources and the character of the receiving environment.

This balancing exercise lies at the heart of the Commission's statutory role. Throughout this submission I have sought to demonstrate that support for renewable energy and careful scrutiny of individual developments are not mutually exclusive. On the contrary, ensuring that renewable energy developments are appropriately located, comprehensively assessed and environmentally sustainable strengthens public confidence in the planning system and supports the long-term delivery of national climate policy.

16.5 Personal Perspective

As explained in my Personal Statement, this application is not simply a planning proposal in the abstract. It concerns the environment in which my family lives.

My wife, Agnes, and I are raising our young daughter in our home at Lissavalley, less than 200 metres from the proposed construction entrance. Our household relies on the Barnaderg Gortbeg Group Water Scheme for our drinking water, and we use the surrounding road network every day. Our home is also regularly visited by close family members, including my elderly mother-in-law and my young niece.

These personal circumstances do not alter the legal or planning considerations that apply to the application. They do, however, explain why I have taken the time to review the Applicant's documentation carefully and why the matters discussed throughout this submission are of genuine and lasting importance to my family.

16.6 Final Observations

The Commission's role is not to determine whether the Applicant believes the proposed development is acceptable, nor whether renewable energy development is desirable in principle.

Rather, the Commission must undertake its own independent assessment of all of the information before it and determine whether the proposed development satisfies the statutory requirements of proper planning and sustainable development.

Throughout this submission I have identified a number of matters which, in my respectful opinion, continue to warrant careful consideration. While these issues span a number of environmental disciplines, they share a common objective: to assist the Commission in determining whether the evidence now before it provides a sufficiently complete, objective and scientifically robust basis upon which to determine the application.

I hope that the observations contained within this submission will assist the Commission in carrying out that important statutory function.

16.7 Closing Remarks

Preparing this submission has required a detailed review of a significant volume of technical and environmental documentation. I have undertaken this work because I believe that meaningful public participation is an important part of the planning process and contributes to better-informed decision-making.

I appreciate the opportunity afforded by **An Coimisiún Pleanála** to make further observations on the Applicant's February 2026 Response and I wish to thank the Members of the Commission, the Inspector and all officials involved for the time and careful consideration that will be given to this submission.

The specific matters that I respectfully request the Commission to consider in determining this application are set out in the **Formal Request** that follows.

17. Formal Request to An Coimisiún Pleanála

Having carefully reviewed the Applicant's **February 2026 Response to Third Party Submissions**, together with the original planning application, the Environmental Impact Assessment Report (EIAR), the Natura Impact Statement (NIS), the Additional Information, the observations of Galway County Council, prescribed bodies and members of the public, I respectfully request that **An Coimisiún Pleanála** give full and careful consideration to the matters raised throughout this submission before reaching its determination.

I respectfully submit that, while the Applicant has provided a substantial volume of additional information, the February 2026 Response has not, in a number of important respects, materially strengthened the evidential basis upon which this application falls to be determined. In many instances, the response provides further explanation and justification of the original assessments rather than new objective evidence capable of resolving the concerns identified during the statutory consultation process.

Accordingly, I respectfully request that the Commission carefully consider whether the information currently before it is sufficiently complete, objective and scientifically robust to enable it to:

- complete a lawful and comprehensive Environmental Impact Assessment (EIA);
- complete an Appropriate Assessment (AA) beyond reasonable scientific doubt;
- conclude that the likely significant environmental effects of the proposed development have been fully identified and assessed;
- conclude that the cumulative effects of the proposed development, both individually and in combination with associated infrastructure and other developments, have been comprehensively assessed;
- conclude that the proposed mitigation measures provide sufficient certainty regarding the protection of groundwater, drinking water resources, biodiversity, residential amenity, public safety and the wider environment; and
- conclude that the proposed development complies with the requirements of the Planning and Development Acts, the Galway County Development Plan 2022–2028, the Local Area Renewable Energy Strategy (LARES), the Environmental Impact Assessment Directive, the Habitats Directive and all other applicable Irish and European planning and environmental legislation.

I further respectfully request that the Commission give particular consideration to the matters identified throughout this submission concerning:

- the protection of the **Barnaderg Gortbeg Group Water Scheme** and associated groundwater resources;
- hydrology, hydrogeology, karst and groundwater vulnerability;
- peat, geology and the reliance placed upon construction-stage verification;
- residential amenity and the cumulative impacts experienced by those living closest to the proposed development, including residents adjacent to the proposed construction access on the R332;
- construction traffic, abnormal load movements and road safety;
- biodiversity, ecology and the interaction between ecological receptors and the hydrological environment;
- the assessment of associated infrastructure and the completeness of the environmental assessment;
- the effectiveness of public consultation and community engagement; and
- the overall planning balance between the acknowledged public benefits of renewable energy development and the protection of the local environment and existing communities.

Throughout this submission I have acknowledged the national importance of renewable energy development and Ireland's commitment to addressing climate change and strengthening energy security. My observations should not be interpreted as opposition to renewable energy development in principle. Rather, they reflect my genuine concern that all developments, regardless of their strategic importance, must satisfy the statutory requirements of **proper planning and sustainable development** and be supported by a comprehensive, transparent and scientifically robust environmental assessment.

As a resident living less than **200 metres** from the proposed construction entrance, whose family home relies on the **Barnaderg Gortbeg Group Water Scheme** for its drinking water, I have a direct and legitimate interest in ensuring that the potential impacts of the proposed development are fully understood and appropriately assessed before any decision is made. I have therefore prepared this submission in good faith and with the sole intention of assisting the Commission in carrying out its independent statutory functions.

For all of the reasons set out throughout this submission, I respectfully request that **An Coimisiún Pleanála** be satisfied, on the basis of complete, objective and scientifically robust evidence, that the proposed development complies with the requirements of Irish and European planning and environmental law and represents the **proper planning and sustainable development** of the area before reaching its final determination.

Should the Commission conclude that material uncertainty remains in relation to any of the issues identified within this submission, I respectfully request that such uncertainty be resolved in accordance with the precautionary approach that underpins Irish and European environmental law.

Finally, I wish to thank the Members of **An Coimisiún Pleanála**, the Inspector and all officials involved in the assessment of this application for the time and careful consideration that will be given to this submission and to the many observations received throughout the planning process.

Respectfully submitted,

Thomas Quirke (Tom)

Lissavally

Barnaderg

Tuam

Co. Galway

Date: 9 July 2026

APPENDIX A

Principal Documents Reviewed

Introduction

In preparing this submission, I have reviewed the principal planning, environmental and technical documentation submitted by the Applicant as part of the original planning application, together with the additional information submitted during the Further Information process and the Applicant's February 2026 Response to Third Party Submissions.

This appendix is included to demonstrate the documentary basis upon which the observations contained within this submission have been prepared. It is not intended to reproduce the contents of those documents but rather to identify the principal sources considered in assessing whether the Applicant's response has adequately addressed the issues raised during the planning process.

A1 Planning Application Documentation

The following principal application documents have been reviewed:

- Planning Application Documentation.
- Environmental Impact Assessment Report (EIAR).
- Natura Impact Statement (NIS).
- Planning Drawings.
- Site Layout Plans.
- Turbine Layout Drawings.
- Infrastructure Layout Drawings.
- Environmental Management documentation.

A2 Environmental Impact Assessment Report

The following chapters of the EIAR were reviewed where relevant to this submission:

- Chapter 3 – Consideration of Alternatives.
- Chapter 4 – Population and Human Health.
- Chapter 5 – Biodiversity.

- Chapter 6 – Land, Soils and Geology.
- Chapter 7 – Hydrology and Hydrogeology.
- Chapter 8 – Noise.
- Chapter 9 – Landscape and Visual.
- Chapter 10 – Cultural Heritage.
- Chapter 11 – Material Assets.
- Chapter 12 – Traffic and Transport.
- Chapter 13 – Climate.
- Chapter 14 – Interactions and Cumulative Effects.

A3 Technical Appendices

The following technical reports were reviewed where relevant:

- Hydrology and Hydrogeology Technical Appendices.
- Groundwater Monitoring Reports.
- Hydrochemical Analysis.
- Ground Investigation Reports.
- Borehole Logs.
- Trial Pit Logs.
- Gouge Core Logs.
- Peat Investigation Reports.
- Geophysical Investigation Reports.
- Electrical Resistivity Tomography (ERT).
- Seismic Refraction Surveys.
- Surface Water Monitoring Results.
- Construction Environmental Management documentation.
- Drainage Design Reports.

A4 Geotechnical Reports

The following reports were considered:

- Geotechnical Karst Risk Assessment.
- Foundation Investigation Reports.
- Geological Interpretation Reports.

- Engineering Geological Assessment.
- Karst Hazard Mapping.

A5 Additional Information Submitted by the Applicant

This submission has also considered:

- Applicant's Response to Further Information.
- Applicant's Response to Third Party Submissions.
- Updated Drawings.
- Revised Environmental Assessments.
- Supplementary Technical Memoranda.
- Updated Monitoring Results.
- Additional Hydrogeological Investigations.
- Additional Geotechnical Investigations.

A6 Statutory Consultees

The observations of the following prescribed bodies have also been considered:

- Geological Survey Ireland.
- Health Service Executive.
- Galway County Council.
- Office of Public Works.
- National Parks and Wildlife Service (where relevant).
- Inland Fisheries Ireland (where relevant).
- Other prescribed bodies where referenced within the planning documentation.

A7 Purpose of this Review

The purpose of reviewing these documents was not to repeat the Applicant's assessment but to determine whether the additional information submitted in response to observations and requests for further information has materially addressed the outstanding planning and environmental issues before An Coimisiún Pleanála.

APPENDIX B

Principal Figures, Drawings and Technical Mapping Reviewed

Introduction

The observations contained within this submission have also been informed by a review of the Applicant's figures, mapping and technical drawings. These drawings provide important context regarding the environmental setting of the proposed development and the conclusions reached within the Environmental Impact Assessment Report and subsequent submissions.

B1 Hydrology and Hydrogeology

The following mapping was reviewed:

- Regional Catchment Mapping.
- Local Catchment Mapping.
- Surface Water Network.
- Existing Drainage Network.
- Watercourse Classification.
- Watercourse Crossing Details.
- Hydrological Study Area.
- Flood Risk Mapping.
- Drainage Infrastructure Layout.

B2 Groundwater

The following figures were reviewed:

- Aquifer Classification Mapping.
- Groundwater Vulnerability Mapping.
- Bedrock Geology Mapping.
- Subsoil Geology Mapping.
- Groundwater Monitoring Borehole Locations.
- Groundwater Contour Mapping.
- Groundwater Monitoring Results.
- Hydrochemical Sampling Locations.

B3 Drinking Water

The following drawings were reviewed:

- Public Water Supplies.
- Group Water Schemes.
- Barnaderg Gortbeg Group Water Scheme.
- Source Protection Areas.
- Zone of Contribution Mapping.
- Groundwater Abstraction Mapping.

B4 Geology

The following geological information was reviewed:

- Bedrock Mapping.
- Fault Mapping.
- Structural Geology.
- Peat Depth Mapping.
- Trial Pit Locations.
- Borehole Locations.
- Gouge Core Locations.
- Engineering Geological Interpretation.

B5 Karst

The following information from the Geotechnical Karst Risk Assessment was reviewed:

- Karst Hazard Mapping.
- Karst Feature Inventory.
- Dolines.
- Springs.
- Geophysical Survey Interpretation.
- Electrical Resistivity Tomography Results.
- Seismic Refraction Results.
- Recommended Mitigation Areas.

B6 Proposed Development

The following drawings were reviewed:

- Turbine Layout.
- Crane Hardstands.
- Access Roads.
- Cable Routes.
- Construction Compounds.
- Temporary Works.
- Drainage Design.
- Surface Water Management.
- Watercourse Crossings.
- Foundation Layouts.

B7 Environmental Monitoring

The following monitoring information was reviewed:

- Surface Water Monitoring Results.
- Groundwater Monitoring Results.
- Seasonal Monitoring.
- Water Quality Analysis.
- Hydrochemical Data.
- Environmental Monitoring Programme.

B8 Relevance to this Submission

The figures and drawings identified above have been reviewed to understand:

- the relationship between the proposed development and the surrounding hydrological environment;
- the sensitivity of groundwater resources and drinking water supplies;
- the geological and hydrogeological characteristics of the site;
- the location of karst features;
- the interaction between proposed infrastructure and sensitive environmental receptors;
and
- whether the Applicant's February 2026 Response to Submissions materially changes the evidential basis of the original environmental assessment.

APPENDIX C

Summary of Geological Survey Ireland (GSI) Observations

Purpose of this Appendix

This Appendix provides a summary of the principal observations made by the **Geological Survey Ireland (GSI)** during the statutory consultation process and highlights the extent to which those observations have been addressed within the Applicant's February 2026 Response. The Appendix is intended as a reference document to assist **An Coimisiún Pleanála** and should be read alongside **Chapter 8 – Hydrology, Hydrogeology, Karst and Drinking Water Resources**.

C1 Principal Issues Raised by Geological Survey Ireland

Geological Survey Ireland Observation	Applicant's Response	Observation in this Submission
Hydrogeological assessment	Additional hydrogeological information submitted.	Additional investigations are acknowledged. The Commission should determine whether they provide sufficient certainty regarding groundwater protection.
Karst geology	Geotechnical Karst Risk Assessment submitted.	Assessment welcomed. The Commission should independently consider whether residual uncertainty remains regarding karst pathways and groundwater connectivity.
Groundwater vulnerability	Further mapping and explanation provided.	Additional clarification is acknowledged. Continued consideration should be given to the sensitivity of the receiving groundwater environment.
Peat and subsoils	Additional geotechnical information submitted.	The relationship between peat stability, groundwater and construction methodology should continue to be considered as an integrated issue.

Geological Survey Ireland Observation	Applicant's Response	Observation in this Submission
Surface water and groundwater interaction	Additional technical explanation provided.	Hydrology and hydrogeology should be considered together, particularly in relation to downstream receptors and drinking water protection.
Construction risk	Construction management measures proposed.	Reliance upon construction-stage mitigation should not replace a robust assessment of likely environmental effects.

C2 General Observation

The Applicant has provided a considerable amount of additional geological and hydrogeological information in response to the observations made by Geological Survey Ireland.

This additional information is welcomed and contributes to a more detailed understanding of the receiving environment.

Nevertheless, as discussed throughout **Chapter 7**, I respectfully submit that the Commission should determine whether the additional information materially strengthens the evidential basis of the application or principally provides additional explanation of the conclusions reached within the original Environmental Impact Assessment Report.

C3 Matters for the Commission

I respectfully request that the Commission satisfy itself that:

- groundwater vulnerability has been fully characterised;
- karst features and groundwater pathways have been comprehensively assessed;
- peat, geology and hydrogeology have been considered together;
- the Barnaderg Gortbeg Group Water Scheme remains adequately protected;
- reliance upon construction-stage mitigation is proportionate to the remaining uncertainty.

APPENDIX D

Summary of Health Service Executive (HSE) Observations

Purpose of this Appendix

This Appendix summarises the principal matters raised by the **Health Service Executive (HSE)** during the planning process and the Applicant's response to those observations.

It should be read alongside **Chapter 9 – Residential Amenity, Human Health and Quality of Life**.

D1 Principal Issues Raised by the HSE

HSE Observation	Applicant's Response	Observation in this Submission
Human health	Applicant concludes no significant adverse effects.	Assessment acknowledged. Commission should consider cumulative effects on nearby residents.
Drinking water protection	Additional hydrogeological information submitted.	Continued protection of the Barnaderg Gortbeg Group Water Scheme remains an important consideration.
Noise	Compliance with relevant standards asserted.	Residential experience extends beyond compliance with numerical limits alone.
Shadow flicker	Applicant concludes predicted impacts remain acceptable.	The Commission should ensure that all potentially affected dwellings have been appropriately assessed.
Air quality	Construction mitigation proposed.	Construction-stage dust management is welcomed but should complement rather than replace robust assessment.
Construction impacts	Construction Environmental Management Plan proposed.	Long-duration construction activity should be considered cumulatively alongside traffic, noise and residential amenity.

D2 General Observation

The Applicant has responded to the matters raised concerning human health through additional technical explanation and by proposing a range of recognised mitigation measures. These measures are acknowledged.

However, human health is influenced by the cumulative interaction of multiple environmental factors including noise, traffic, residential amenity, water quality, air quality and quality of life. Accordingly, I respectfully request that the Commission consider these matters collectively rather than individually.

D3 Matters for the Commission

The Commission is respectfully requested to consider:

- cumulative effects upon nearby residents;
- construction duration;
- traffic-related effects;
- protection of drinking water;
- interaction between environmental disciplines;
- long-term residential amenity.

APPENDIX E

Summary of Matters Remaining for the Commission's Determination

Purpose of this Appendix

This Appendix consolidates the principal matters identified throughout this submission which, in my respectful opinion, continue to warrant careful consideration by **An Coimisiún Pleanála** before determining the proposed Cooloo Wind Farm application.

The Appendix is intended as a summary reference only and should be read in conjunction with the detailed discussion contained within each chapter.

E1 Planning Process

- Whether the Applicant's February 2026 Response materially addresses the issues raised during the statutory consultation process.
- Whether the additional information has materially strengthened the evidential basis of the application.

E2 Hydrology & Hydrogeology

- Protection of the Barnaderg Gortbeg Group Water Scheme.
- Groundwater vulnerability.
- Karst geology.
- Surface water and groundwater interaction.
- Reliance upon construction-stage mitigation.
- Long-term groundwater monitoring.

E3 Environmental Impact Assessment & Appropriate Assessment

- Completeness of the Environmental Impact Assessment.
- Completeness of the Appropriate Assessment.
- Interaction between environmental disciplines.
- Reliance upon mitigation.
- Assessment of the project as a whole.
- Cumulative effects.

E4 Residential Amenity

- Residential receptor identification.
- Construction impacts.
- Noise.
- Shadow flicker.
- Quality of life.
- Human health.
- Cumulative residential effects.

E5 Traffic & Road Safety

- Construction traffic.
- Abnormal load deliveries.
- Road safety.
- Construction access.
- Traffic surveys undertaken during July.
- Effects upon residents living adjacent to the R332 entrance.

E6 Biodiversity

- Birds.
- Bats.
- Habitat connectivity.
- Hydrological pathways.
- Ecological monitoring.
- Cumulative ecological effects.

E7 Cultural Heritage

- Archaeological monitoring.
- Construction impacts.
- Historic landscape.
- Protection of recorded monuments.

E8 Climate & Sustainable Development

- Overall planning balance.
- Climate benefits.
- Environmental protection.
- Sustainable development.

E9 Overall Planning Balance

The Commission is respectfully requested to determine whether:

- the Applicant has discharged the burden of demonstrating that the proposed development complies with the requirements of proper planning and sustainable development;
- the Environmental Impact Assessment and Appropriate Assessment can be completed on the basis of the information before the Commission;
- likely significant environmental effects have been comprehensively identified and assessed;
- the proposed mitigation measures provide sufficient certainty to protect groundwater, biodiversity, residential amenity and public safety;
- the cumulative effects of the proposed development have been fully considered; and
- the proposed development, viewed as a whole, represents the proper planning and sustainable development of the area.