Professor Mike Gormally FRES,

Cloonsheen,

Cloghans Hill,

Tuam.

Co. Galway

20.11.2025

Observation

Re: Application Number: PAX07.323761

Proposal by Neoen Renewables Ireland Limited to erect nine wind turbines of 180m locates within Cloondahamper, Cloonascragh, Elmhill, Cooloo, Lecarrow, Dangan Eighter, Lissavally and Slievegorm, Co. Galway

Request for planning permission lodged on 29/09/2025

Competency of Professor Mike Gormally FRES

Professor (Environmental Science) at the University of Galway where my scientific research and teaching, over 30 years, focussed primarily on human interactions with and impacts on the environment. I have numerous peer-reviewed publications relating to the biodiversity and conservation of turloughs, peatlands and grasslands

To whom it may concern,

I believe it is essential that The Bord, in considering this application, take account of the fact that the EIAR is fundamentally flawed and is not fit for the purpose intended in allowing a full and robust assessment of the likely significant effects of the proposed development on the receiving environment direct or indirect, or in combination with other effects. The criteria for these considerations of what must be assessed and considered is set out in the criteria of projects falling under the remit of the EU EIA Directive 2011/92/EU as amended by 2014/52/EU under Article 3(1).

The Bord cannot permit this development on the basis of an inadequate adherence to the regulations of this Directive and therefore must refuse.

Council Regulations (EU) 2022/2577 permits streamlining of permit granting processes for renewable energy projects. This does not set aside the obligations for proper environmental assessment and the identification of likely significant and cumulative impacts of a proposed project on the receiving environment.

P.T.O.

1. Birds survey methodologies

The EIAR for Cooloo Wind Farm (hereafter referred to as the "EIAR") states that "*In the absence of specific national ornithological survey guidance for Ireland.....guidance documents published by NatureScot (formerly Scottish Natural Heritage [SNH]) have been followed to inform this assessment*".

One such document referenced extensively in this EIAR is the 2017 "Recommended bird survey methods to inform impact assessment of onshore wind farms. Scottish Natural Heritage, Inverness, Scotland ". This document (Version 2) was published eight years ago and was based, at that time, on a combination of knowledge sourced from the scientific literature leading up to 2017 and expert opinion prior to publication. In addition, the above SNH document states that this guidance document is "*not prescriptive or able to cater for every possible scenario..*" and "*.. not exhaustive and there may well be occasions where novel or different survey methods are required*".

These guidelines do not take into account the most recent developments in ornithology and over the last ten years, knowledge regarding appropriate bird survey methods has increased enormously. The most up-to-date guidelines for bird surveys in the UK is "Bird Survey & Assessment Steering Group (2025) Bird Survey Guidelines for assessing ecological impacts, v.1.1.1. https://birdsurveyguidelines.org/". Given that Northern Ireland shares the island of Ireland and its associated fauna and habitats with the Republic of Ireland, these more recent guidelines are also suitable for the Republic of Ireland. Since these guidelines were launched in 2023, it would have been possible to incorporate them as best practice at least during the bird survey period undertaken for the Cooloo Wind Farm EIAR between August 2023 and March 2025 but this does not appear to have been done.

In addition, the accuracy of the SNH recommended Vantage Point Surveys used in this EIAR has recently been questioned by Dr Tom Gittings (Independent Ecological Consultant since 2001) who has analysed Vantage Point data. He states that detection rates tend to decline with distance from Vantage Points "***...with very low detection rates at distances of more than 1km from vantage points***" (Gittings, 2024). This statement was not referred to under the Limitations (section 7.2.5.3, p7-14) of the EIAR although Dr Gittings presented his findings at the Chartered Institute of Ecology & Environmental Management (CIEEM) conference in 2024, a professional body to which many ecological staff working in environmental consultancies belong.

It is currently accepted (as evidenced by GPS tracking studies) that many bird species are active at night and the SNH (2017) bird survey guidelines do not take account of night-time activity. It is for this reason that additional surveys using thermal imaging and passive audio recording (Table 1) are required to ensure that the bird data collected for the EIAR have been collected using current best practice methods and are robust enough to determine the potential impacts of the wind farm on the birds in the area. A measure of night-time activity of birds across the footprint of the proposed wind farm is essential given the increased risk of collisions at night when visibility is poor.

One of the consultees (Development Applications Unit, Department of Tourism, Culture, Arts, Gaeltacht, Sports & Media) for the proposed Cooloo Wind Farm states explicitly that "***limitation in guidance documentation, used in the analysis and discussion of results from any bird surveys, should be acknowledged***" and that "***migration routes (day and night) should be assessed as well as the flight lines (day and night) of birds travelling between roosting and feeding areas***" (Section 7.2.2, p 7-14). No mention was made in the EIAR under "Limitations" (Section 7.2.5.3, p 7-14) about the absence of data relating to bird activity at night – this could have been informed by passive audio recording and thermal imaging (Table 1). Rather the EIAR states that "***... no significant limitations in the scope, scale or context of the assessment have been identified***".

Absence of the use of thermal imaging and passive audio recording in conjunction with lack of reference to Gittings (2024) regarding the limitations of Vantage Point recording, indicates that the bird survey data presented in this EIAR are incomplete, out of date and not fit for purpose.

A comparison of a selection of appropriate methodologies recommended by the Bird Survey Guidelines (UK) compared with the SNH methodologies used in this EIAR can be seen in Table 1 below.

Table 1

	Bird Survey Guidelines UK (2025)	**Methodologies used in EIAR based on SNH (2017)**
Nocturnal bird surveys	Recommended that **thermal imaging** be undertaken to quantify how birds are using habitats after dark, particularly for: • Winter waders • Migratory geese • Certain species of owl	**No thermal imaging** undertaken *Note: This technology has been used for avian studies since the early 2000s and the environmental consultancy which prepared this EIAR has the necessary equipment but did not employ it for this EIAR.*
Passive audio recording	**Passive audio recording** should be considered to identify: • extent of nocturnal migration over site • presence of nocturnal site usage	**No passive audio recording** undertaken. *Note: This technology has been in use for over 10 years in avian studies*

Precautionary Principle

The Precautionary Principle as defined by the Chartered Institute of Ecology and Environmental Management (CIEEM) should be followed in this case:

"*The evaluation of significant effects should always be based on the* ***best available scientific evidence****. If sufficient information is not available further survey or additional research may be required. In cases of reasonable doubt,* ***where it is not possible to robustly justify a conclusion of no significant effect, a significant effect should be assumed****. Where uncertainty exists, it must be acknowledged...".*

The above comments provide evidence of a deficiency of sufficiently robust data to determine with confidence, the impacts of the proposed Cooloo Wind Farm on birds. The information on birds contained within the EIAR does not, therefore, form a baseline for adherence to the EU EIA Directive (2011/92/EU as amended by 2014/52/EU) which states "*The effects of a project on the environment should be assessed in order to take account of concerns ...to ensure maintenance of the diversity of species and to maintain the reproductive capacity of the ecosystem as a basic resource for life*".

Yours faithfully,

Mike Gormally

References:

Bird Survey & Assessment Steering Group (2025) Bird Survey Guidelines for assessing ecological impacts, v.1.1.1. https://birdsurveyguidelines.org/".

SNH (2017). Recommended bird survey methods to inform impact assessment of onshore wind farms. Scottish Natural Heritage, Inverness, Scotland. Available at: https://www.nature.scot/sites/default/files/2018-06/Guidance%20Note%20-%20Recommended%20bird%20survey%20methods%20to%20inform%20impact%20assessment%20of%20onshore%20windfarms.pdf