

File With _____

SECTION 131 FORM

Appeal NO: ACP - 323676 - 25Defer Re O/H ☐

Having considered the contents of the submission dated/ received 30/7/26
from

NOELEN HAMILTON recommend that section 131 of the Planning and Development Act, 2000

~~be~~/not be invoked at this stage for the following reason(s): NO New Planning Material

E.O.: Catherine FlynnDate: 3/8/26

For further consideration by SEO/SAO

Section 131 not to be invoked at this stage. ☐

Section 131 to be invoked – allow 2/4 weeks for reply. ☐

S.E.O.: _____

Date: _____

S.A.O.: _____

Date: _____

M _____

Please prepare BP _____ - Section 131 notice enclosing a copy of the attached submission

to: _____ Task No: _____

Allow 2/3/4weeks – BP _____

EO: _____

Date: _____

AA: _____

Date: _____

File With _____

CORRESPONDENCE FORM

Appeal No: ACP -323676-25M r. BurkePlease treat correspondence received on 30/7/26 as follows:

1. Update database with new agent for Applicant/Appellant _____

2. Acknowledge with SC203. Keep copy of Commission's Letter ☐1. RETURN TO SENDER with BP WATSON2. Keep Envelope: ☐3. Keep Copy of Commission's letter ☐

Amendments/Comments

NOELEN HAMILTON RESPONSE TO SC131

4. Attach to file

(a) R/S ☐(d) Screening ☐(b) GIS Processing ☐(e) Inspectorate ☐(c) Processing ☐RETURN TO EO ☐Plans Date Stamped ☐Date Stamped Filled in ☐EO: [Signature]AA: [Signature]Date: 31/7/26Date: 4/8/26



Outlook

Submission re Case SU19.323676 Noeleen Hamilton

From Noeleen Hamilton <gfflorist@gmail.com>

Date Thu 30 Jul 2026 4:58 PM

To Appeals2 <appeals@pleanala.ie>; Communications <communications@pleanala.ie>

 1 attachment (2 MB)

Signed Further Observtions.pdf;

You don't often get email from gfflorist@gmail.com. [Learn why this is important](#)

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Please find attached my further submission/observation in regards to case no SU19.323676 as requested .

Kind regards
Noeleen Hamilton
085 7165916

MICHIGAN

CC

1870

1870

1870

I acknowledge receipt of your letter dated **10 July 2026** inviting submissions in response to the observations received from the Health Service Executive, Transport Infrastructure Ireland and the Development Applications Unit.

In particular, I request that the Commission carefully considers the following matters:

Archaeological Assessment Report "The presence of protected freshwater mussels within watercourses connected to the development area demonstrates the sensitivity and integrity of the local hydrological system. These same waterlogged conditions are fundamental to the preservation of archaeological deposits within peatlands. Any alteration to groundwater levels, drainage patterns or sediment transport capable of affecting freshwater mussels may also compromise the preservation of buried archaeological remains. Accordingly, ecological and archaeological assessments should not be considered in isolation, as both depend upon maintaining the natural hydrological regime."

Hydrological impacts

- Whether the environmental information adequately assesses the effects of historical and ongoing drainage on surrounding watercourses and road ways.
- Whether the proposed mitigation is sufficient to prevent further deterioration of water quality and protected habitats.
- How drainage, peat excavation or changes in the bog hydrology could affect surface water quality, private water supplies, rivers, groundwater or protected aquatic species or all plant life that in turn can affect all wild life or potential Archaeology connected to Lemanaghan Bog.

Freshwater Pearl Mussels

- If any rivers or streams receiving drainage from Lemanaghan Bog support freshwater pearl mussel populations or are hydrologically connected to designated catchments, I request that the Commission ensure the assessment fully complies with the Habitats Directive.
- As a result of **Freshwater Mussels becoming exposed this year in Lemanaghan Bog**, any uncertainty regarding impacts should be resolved before substitute consent is considered.

Water Drainage of Lemanaghan Bog can and will have a huge effect on wildlife:

One of the best examples of how species are connected is:

Devil's-bit scabious → Marsh fritillary caterpillar → adult marsh fritillary butterfly → birds, spiders and bats

If devil's-bit scabious disappears because of drainage or habitat change, marsh fritillaries cannot complete their life cycle, affecting predators higher up the food chain.

Peatland restoration

- The application should demonstrate that restoration measures are capable of restoring ecological function and carbon storage rather than merely stabilising the site.

Potential Impact on Human Health from Draining Lemanaghan Bog

The drainage and disturbance of Lemanaghan Bog has the potential to affect human health through changes to water resources, air quality and the local environment.

- **Water Quality** Peatlands act as natural water storage systems, helping to regulate local hydrology and maintain water quality. Draining the bog can alter groundwater and surface water flows, potentially affecting springs, streams and private wells that may be connected to the bog system. Any deterioration in water quality or reduction in local water availability could have implications for households dependent on these resources.
- **Air Quality** There are five schools located in the wider area surrounding Lemanaghan Bog, including Rashina National School, Boher National School, Pollagh National School, and two schools in Ferbane. Given their proximity to the bog, there is a significant concern that peat disturbance arising from excavation, road construction, turbine foundations, drainage works, and associated construction activities could generate airborne peat dust and fine particulate matter.
- **Local Environment** Particularly during dry weather and periods of strong winds. Fine peat particles may travel beyond the bog and affect nearby communities & homes also. Exposure to increased dust levels can cause respiratory irritation and may present a greater concern for children, older people and those with existing respiratory conditions.
- **Fire Risk and Human Health Impacts**
- Drained and degraded peatlands are significantly more vulnerable to fire, particularly during periods of hot, dry and windy weather. The recent peat fires experienced on Lemanaghan Bog and other bogs across the country demonstrate the increased risk associated with drying peatlands. Peat fires can burn underground for extended periods, producing large quantities of smoke, fine particulate matter (PM2.5), carbon monoxide and other pollutants.
- These emissions can travel over considerable distances depending on wind conditions, potentially affecting nearby homes, communities, schools and vulnerable individuals with respiratory or cardiovascular conditions. Smoke inhalation from peat fires represents a direct human health concern and highlights the importance of maintaining healthy, water-retaining peatlands as a natural fire prevention measure.
- The disturbance, drainage and drying of peat associated with development activities may increase the risk of peat oxidation and fire, creating avoidable risks to both local air quality and public health.

Drainage of peatlands can also contribute to the release of stored carbon and the loss of the natural functions that healthy bogs provide, including water regulation, flood reduction and climate regulation. The long-term degradation of peatlands may contribute to wider environmental changes that affect community wellbeing.

Given the proximity of residential areas and schools around Lemanaghan Bog, the potential effects of drainage on air quality, water supplies and human health should be fully assessed before any development proceeds. The applicant should demonstrate, with supporting scientific evidence, that drainage and associated works will not create unacceptable risks for the health and wellbeing of the local community.

Transport Infrastructure Ireland (TII)

Strategic Importance of the N62

The N62 is more than a local access road. It forms an important north–south transport corridor connecting the M6 near Athlone and the M8 near the Horse & Jockey and is used by long-distance traffic travelling between the northwest and southeast of Ireland, including journeys between Sligo, Athlone, Tipperary and Waterford. The Traffic Assessment should therefore consider not only local traffic volumes but also the impact on strategic inter-regional traffic, freight movements, public transport, tourist traffic, agricultural vehicles and emergency services. Temporary disruption caused by abnormal-load deliveries or construction traffic may have wider consequences than those reflected by average daily traffic counts alone.

Safety Concerns at the N62 / L7018 Corbane Junction

The existing junction between the N62 and the L7018 at Corbane is already a location of significant concern for local road users. Vehicles attempting to access the L7018 from the N62 must wait on a national road carrying high-speed traffic, creating a potentially hazardous situation.

The introduction of substantial additional construction traffic associated with the proposed wind farm has the potential to significantly worsen existing safety issues at this location.

Particular concerns include:

- vehicles waiting to turn right from the N62 into the L7018 being exposed to approaching traffic travelling at national road speeds;
- increased risk of rear-end collisions caused by vehicles slowing or stopping unexpectedly;
- construction vehicles and HGVs having reduced manoeuvrability compared with ordinary traffic;
- additional delays and queuing caused by increased traffic movements;
- increased risk for local residents, agricultural vehicles and other road users accessing the L7018.

The Traffic and Transport Assessment should not assess the impact of the development solely by reference to average traffic increases. It should specifically assess the interaction between the proposed wind farm traffic and the existing Corbane junction arrangement.

A detailed independent Road Safety Audit should be undertaken, taking account of:

- existing visibility at the N62/L7018 junction;
- vehicle waiting times and turning movements;
- collision history and near misses;
- the effect of HGV and abnormal-load traffic;
- impacts during peak construction periods.

Where an existing junction presents safety challenges, adding significant volumes of heavy construction traffic should require a precautionary approach. The development should not proceed unless it can be demonstrated that it will not increase the existing risk to road users at Corbane. Traffic assessments based on average daily vehicle numbers do not adequately capture the lived experience of residents who use this junction every day. A road safety assessment must consider the

type of vehicles involved, the timing of movements, existing road conditions and the vulnerability of those who depend on this route.

The proposed development should not add significant additional traffic pressure to an existing junction without first demonstrating that the safety of the local community can be fully protected.

For these reasons, I respectfully submit that substitute consent should not be granted unless the Commission is satisfied beyond reasonable scientific doubt that the requirements of the Planning and Development Act, the EIA Directive and the Habitats Directive have been fully met.

Yours faithfully,

Noeleen Hamilton

Noeleen Hamilton