

Submission of Fabian and Donna McMorro

Development: Lissinagroagh Wind Farm

Applicant: FuturEnergy Ireland

Case Reference: PAX12.324290

Location: Boleyboy, Cashelaveela, Cherrybrook, Killea, Coolodonnell, Faughary, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullysheherny, Co. Leitrim

Dear Sir/Madam,

We wish to object to the proposed Lissinagroagh Wind Farm development on Dough Mountain and Saddle Hill, County Leitrim.

My name is Fabian McMorro and I live with my wife, Donna, and our three children at Shasmore, Manorhamilton, Co. Leitrim (F91 P2D3) (ITM X 590895, Y 844915). I was born and raised on our family farm in Shasmore, and we continue to own and farm lands in the townlands of Shasmore and Lisdarush. As residents, landowners and active farmers with a detailed knowledge of this area developed over many years, we believe we are well placed to comment on the likely impacts of this proposed development.

Our residence is located approximately 784 metres from the centre of proposed Turbine T3 **ITM coordinates X:591465 Y:844375** and approximately 610 metres from the nearest edge of the associated hardstand. Given this proximity, we have carefully reviewed the planning application and supporting environmental documentation.

Since April, alongside our full-time employment, family commitments and farming activities, we have devoted considerable time to reviewing the extensive planning documentation.

During that review, we identified what we believe are numerous inaccuracies and omissions, including misleading measurements, incomplete mapping and the omission of important landscape features and watercourses. These issues are addressed in detail throughout this submission.

While we recognise that this application is being advanced under the RED III planning process, we are concerned that the documentation does not demonstrate the level of accuracy and completeness expected for a development of this scale. In our view, significant elements of the application require further assessment and clarification before they can properly inform the Board's consideration.

We are particularly disappointed by the manner in which FuturEnergy (the applicant) has communicated and engaged with us as near neighbours.

Our submission focuses primarily on proposed Turbines T1, T2 and T3 and the surrounding lands, as these are the areas with which we have the greatest direct knowledge through our

residence, farming activities and long-standing connection to the locality. The following sections set out our detailed observations and grounds of objection.

1. Archaeological Heritage

1.1 AH01 (RMP Nos. LE008-006001 & LE008-006002) separation distance from T3 excavation works.

The EIAR states that the archaeological complex **AH01** (RMP Nos. **LE008-006001** Ring-cairn and **LE008-006002** Cist) is located **146 metres** from proposed Turbine T3. However, the application does not include any dimensioned drawing demonstrating how this distance was derived or identifying the minimum separation distances between the archaeological monument and the various components of the proposed development. The stated distance appears to have been measured from the centre point of Turbine T3 rather than from the nearest extent of the proposed works.

The application does not identify the separation distances from AH01 to the turbine hardstand, turbine foundation, crane pad, excavation limits, cable trenches or associated drainage infrastructure. This is a significant omission, as these are the elements that will involve the greatest level of excavation and ground disturbance.

Having examined **Drainage Layout Plan 1 of 6 (Drawing No. 10955-2051)**, we note that a proposed interceptor drain is located between AH01 and Turbine T3. Based on approximate measurements taken from this drawing, the interceptor drain appears to pass within approximately **50–60 metres** of the archaeological monument. As the drawing contains no dimensioned offsets or separation distances, this measurement cannot be independently verified and could only be confirmed by the applicant.

The absence of dimensioned plans means that neither the public nor the Board can independently establish the true minimum separation distances between AH01 and the proposed excavation works. This is particularly concerning given that AH01 is located within an upland blanket bog and karst landscape, where archaeological remains may be sensitive to changes in hydrology and ground conditions. The application does not adequately demonstrate that excavation associated with interceptor drains and other ancillary infrastructure would not adversely affect the archaeological monument or its surrounding environment.

In our view, the application should have clearly identified and dimensioned the relationship between AH01 and all elements of the proposed development, including turbine foundations, hardstands, crane pads, cable trenches, interceptor drains and any other associated excavation works. Without this information, it is not possible for the Board or members of the public to properly assess the potential impacts of the proposed development on this protected archaeological site.

Figure 1.1 below reproduces **Drainage Layout Plan 1 of 6 (Drawing No. 10955-2051)**. The proposed interceptor drain has been highlighted in **green**, while the location of archaeological monument **AH01 (LE008-006001 & LE008-006002)** has been highlighted in **yellow**. This figure illustrates the proximity of the proposed drainage works to the archaeological complex and highlights the absence of dimensioned separation distances within the applicant's submitted drawings.

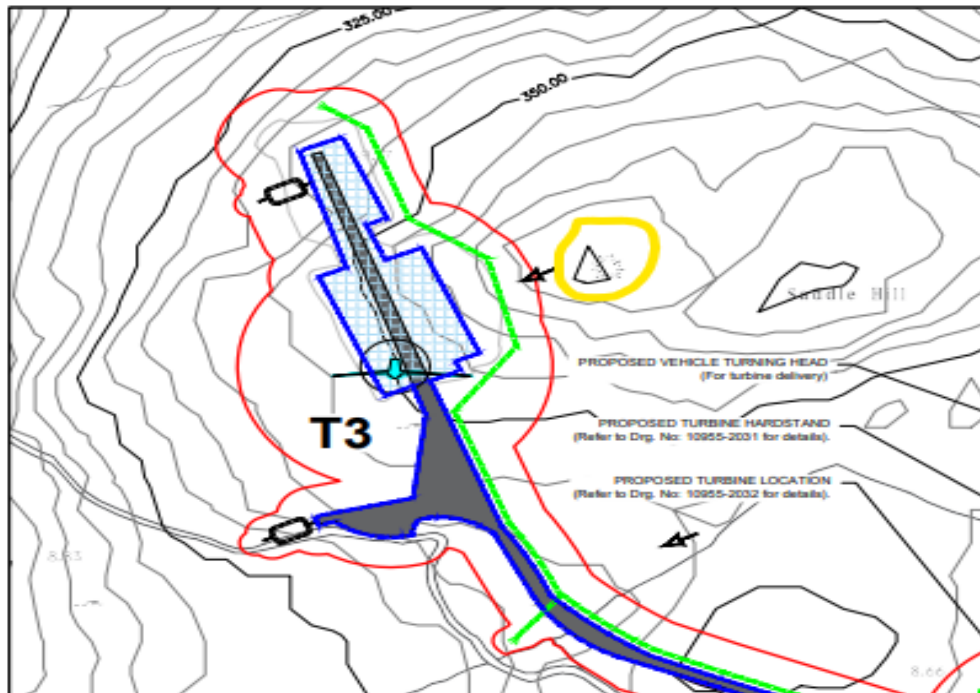


Figure 1.1 Drainage Layout Plan 1 of 6 (Drawing No. 10955-2051), Note Green interceptor drain and Cairn AH01 we have highlighted in Yellow.

1.2 AH03 (RMP No. LE008-005 – Wedge Tomb) incorrectly located.

The planning application does not include a map identifying the location of AH03 (Recorded Monument LE008-005 – Wedge Tomb). Consequently, it is not possible to determine the location of the monument relied upon by the applicant in preparing the archaeological and cultural heritage assessment.

My family owns the lands on which this recorded monument is situated, and we are familiar with its location through long-standing knowledge and management of the property. The wedge tomb is located at approximately **ITM X: 591704, Y: 844725**. This location is supported by geotagged photographs taken at the monument and can readily be verified by site inspection.

The location relied upon within the planning documentation therefore appears to differ from the monument's actual position on the ground. In the absence of an archaeological location plan, neither the Board nor members of the public can verify the baseline mapping used by the applicant or assess whether the archaeological assessment has been prepared using an accurate dataset.

This discrepancy is significant because it affects the assessment of the wider archaeological landscape rather than simply the location of an individual monument. Based on its verified

location, AH03 lies approximately **280 metres** from AH01 (RMP Nos. LE008-006001 and LE008-006002), indicating that these monuments form part of a relatively concentrated prehistoric landscape. The location apparently relied upon within the planning documentation places AH03 approximately **800 metres further away**, materially altering the apparent spatial relationship between these recorded monuments.

The corrected location of AH03 also changes its relationship with other recorded monuments in the area. When plotted at its verified location, AH03 lies on an approximate alignment between AH01 (RMP Nos. LE008-006001 and LE008-006002) and AH02 (RMP No. LE008-001), located approximately 1 kilometre beyond AH03. While no conclusion is drawn as to whether this alignment is intentional, the apparent spatial relationship between these prehistoric monuments forms part of the archaeological landscape and should have been identified and considered within the archaeological assessment. The use of an apparently incorrect location for AH03 may therefore have affected the applicant's assessment of the archaeological setting and the relationships between these monuments.

Accurate identification and mapping of recorded monuments is fundamental to a robust archaeological assessment. If an incorrect monument location has been used, any separation distance calculations, visual assessments, archaeological setting assessments or cultural heritage evaluations that depend upon the monument's position may also be unreliable.

The applicant should therefore verify the location of LE008-005 through site inspection and review all mapping, distance calculations, visualisations and archaeological assessments that rely upon the monument's location. Until the monument has been accurately located and the assessment revised where necessary, the Board cannot be satisfied that the archaeological and cultural heritage assessment has been prepared using an accurate and complete baseline dataset.



Figure 1.2 AH03,LE008-005 – Wedge Tomb ITM X: 591704, Y: 844725 with Saddle Hill in the background

1.3 Failure to identify and assess "The Seven Rooms" cave system

The applicant has failed to identify, map or assess the cave system known locally as "**The Seven Rooms**", located on Saddle Hill at approximately **ITM X: 591380, Y: 844573**.

The significance of this omission is heightened by the fact that *The Seven Rooms* is not an obscure or recently identified feature. It has long formed part of the local cultural landscape and is recorded in the **Dúchas Schools' Collection (1937–1939)**, demonstrating that it was recognised locally and considered sufficiently important to be documented as part of the National Folklore Collection.

Based on the applicant's submitted drawings, the proposed hardstand for Turbine T3 appears to extend to within approximately **10 metres** of the cave rock face. Despite this very close proximity, the EIAR contains no reference to the cave within the archaeological, geological, hydrogeological or cultural heritage assessments.

Although some entrances to *The Seven Rooms* remain visible, others have been infilled over the years to prevent sheep from entering the cave system and becoming trapped. In addition, sections of the cave have naturally collapsed due to the brittle and fractured nature of the limestone bedrock. Consequently, the entrances currently visible on the surface may not represent the full extent of the underground cave system. This uncertainty further emphasises

the need for appropriate geological, hydrogeological and archaeological investigation before excavation and construction works are undertaken in such close proximity.

This omission is particularly concerning given the concentration of recorded prehistoric monuments on Saddle Hill, including AH01 (RMP Nos. LE008-006001 and LE008-006002) and AH03 (RMP No. LE008-005), together with the area's karst geology, swallow holes and complex groundwater pathways. These features collectively indicate a prehistoric landscape that extends beyond the recorded monuments alone. In the absence of any assessment of *The Seven Rooms*, the extent of the cave system and its relationship with the surrounding karst network remain unknown.

Modern archaeological research has increasingly recognised that caves can form an integral component of Neolithic ritual and funerary landscapes. Archaeologist **Dr Marion A. Dowd**, in her research *The Use of Caves for Funerary and Ritual Practices in Neolithic Ireland* and *The Role of Caves in Complex Neolithic Funerary Rituals on Knocknarea Mountain, Co. Sligo*, demonstrates that caves in Ireland were used for funerary and ritual practices during the Neolithic and should be considered as potential archaeological features rather than solely geological formations. Her work on the Knocknarea ritual landscape illustrates the importance of assessing caves within their wider archaeological and landscape context, particularly where they occur in close association with recorded prehistoric monuments.

Given the close proximity of *The Seven Rooms* to a cluster of recorded prehistoric monuments, together with its location within a karst landscape, it cannot simply be assumed that the caves are of geological interest only. Whether the caves possesses archaeological, geological, hydrogeological, cultural heritage or palaeoenvironmental significance has not been investigated or assessed by the applicant.

The complete omission of *The Seven Rooms* from the baseline environmental surveys calls into question the adequacy and completeness of the EIAR. Without any assessment of the cave, the Board has not been provided with sufficient information to determine whether the proposed development, including the construction of the T3 hardstand, associated excavation works, drainage infrastructure and changes to local hydrology, could directly or indirectly affect an unassessed component of this prehistoric landscape.

The applicant should therefore be required to accurately map the cave system, establish its extent, undertake an appropriate archaeological, geological, hydrogeological and cultural heritage assessment, and evaluate the potential direct and indirect impacts of the proposed development on the cave before the application can be properly determined.



Figure 1.3 *View of “The Seven Rooms”*



Figure 1.4 *Rock face of “Seven Rooms”*



Figure 1.4 *Entrance blocked up with stone.*

Conclusion - Adequacy of the archaeological baseline assessment

The issues identified in Sections 1.1 to 1.3 raise significant concerns regarding the adequacy of the baseline information used to prepare the Archaeological, Architectural and Cultural Heritage chapter of the EIAR.

These issues include:

- the absence of dimensioned drawings identifying the minimum separation distances between AH01 and the proposed excavation works;
- the apparent use of an incorrect location for AH03, affecting the assessment of its relationship with neighbouring prehistoric monuments;
- the omission of *The Seven Rooms* cave system from the archaeological, geological, hydrogeological and cultural heritage assessments, despite its immediate proximity to the proposed T3 hardstand; and
- the apparent failure to consider the wider prehistoric landscape of Saddle Hill in assessing the potential impacts of the proposed development.

The purpose of the baseline assessment is to identify the environmental receptors that may be affected by the proposed development so that likely impacts can be properly assessed and appropriate mitigation measures designed. Where the baseline information is incomplete or inaccurate, the subsequent assessment of impacts and the mitigation measures derived from that assessment cannot be regarded as fully reliable.

In these circumstances, it has not been demonstrated that the proposed mitigation measures are sufficient to avoid or reduce impacts on the archaeological, architectural and cultural heritage resource. Before the Board can properly assess the likely significant effects of the proposed development, the applicant should be required to verify the archaeological baseline, address the omissions and discrepancies identified above, and revise the assessment and any associated mitigation measures where necessary.

Until these matters have been addressed, the Board cannot be satisfied that the EIAR provides a complete and accurate assessment of the likely effects of the proposed development on the archaeological, architectural and cultural heritage of Saddle Hill.

References

Dowd, M., Kahlert, T. and McKenzie, C. 2019. The role of caves in complex Neolithic funerary rituals on Knocknarea Mountain, Co. Sligo. The Journal of Irish Archaeology 28, 1–15.

Dowd, M.A. 2008. The use of caves for funerary and ritual practises in Neolithic Ireland. Antiquity 82, 305–317.

2. Hydrology

2.1 Omission of groundwater-fed watercourse

The applicant has failed to identify a groundwater-fed watercourse approximately **750 metres** in length that forms part of the hydrological network on the southern side of Saddle Hill.

The watercourse emerges from the karst system at approximately **ITM X: 591001, Y: 844384**, approximately 440m from T3, see **Figure 2.1** and **Figure 2.2**, where groundwater resurfaces following recharge through swallow holes, fractures and limestone pathways on Saddle Hill. From this point, it flows as a perennial stream beneath the R282 through **Bridge R282-4** (approximately **ITM X: 590569, Y: 844640** see **Figure 2.4**,) before entering the Ballagh River at approximately **ITM X: 590362, Y: 844748**.

The stream is a permanent watercourse and flows throughout the year. It passes beneath the R282 through **Bridge R282-4** of approximately **1.8 metres (6 feet) in diameter**, and the open channel reaches widths of approximately **0.9 metres (3 feet)** in places before joining the Ballagh River.

Despite its size, permanence and direct connection to the Ballagh River, this watercourse is not shown on the applicant's submitted hydrology, hydrogeology or drainage drawings and is not identified or assessed within the Hydrology and Hydrogeology chapters of the EIAR.

The Ballagh River forms part of the hydrological pathway to the **Lough Melvin SAC**. Consequently, this omitted stream represents a direct surface-water pathway through which sediment, suspended solids or accidental contaminants generated during construction could be transported downstream.

The omission is particularly significant within a karst environment, where groundwater and surface water are intrinsically linked. Accurate identification of groundwater emergence

points and receiving watercourses is fundamental to understanding groundwater flow, surface-water connectivity and potential pollutant transport pathways. The complete omission of a permanent watercourse of this scale raises concerns regarding the completeness of the baseline hydrological assessment and whether all hydrological pathways associated with the proposed development have been identified.

In light of this omission, the applicant should be required to incorporate this watercourse into the baseline hydrological model, reassess the hydrological connectivity of the site, and review the potential impacts of the proposed development on downstream water quality, including potential effects on the **Lough Melvin SAC**, before the application can be properly determined.



Figure 2.1 *Satellite view showing route of omitted water-course on Saddle Hill.*

Note T3 ITM coordinates X:591465 Y:844375



Figure 2.2 *Water rising from ground forming omitted watercourse.*



Figure 2.3 *Watercourse as it continues downhill to Ballagh River.*



Figure 2.4 Bridge R282-4 under R282 with omitted watercourse.

2.2 Failure to identify and assess existing springs and wells

The applicant has failed to identify and assess existing groundwater springs and wells located on our lands at **Shasmore** and **Lisdarush**, both of which lie downslope of the proposed development.

On our family lands at **Shasmore**, located below the proposed development T3 on Saddle Hill, there are at least **three perennial groundwater springs** that flow throughout the year.

These springs are currently used as a water supply for livestock and form part of the established farming operation on the property. One of these springs has also been identified as a potential future backup domestic water supply.

In addition, our family lands at **Lisdarush**, located downslope of proposed Turbine T1, contain at least **three further perennial groundwater springs**, all of which are also used as a water supply for livestock.

Despite the presence of these groundwater receptors, they do not appear to have been identified within the baseline hydrological or hydrogeological assessment. Consequently, no assessment has been undertaken of whether the proposed development, including turbine excavations, hardstands, access tracks, cable trenches, drainage works and interceptor drains,

could affect groundwater flow paths, spring discharge, groundwater quality or water availability.

This omission is particularly significant given the karst limestone geology of Saddle Hill and the surrounding uplands, where groundwater movement commonly occurs through fractures, fissures and swallow holes. In such environments, groundwater flow paths can be complex and difficult to predict, making the identification of existing springs, wells and groundwater emergence points a fundamental component of any hydrogeological assessment.

The omission of these perennial springs, when considered alongside the failure to identify the groundwater-fed watercourse described in Section 2.1, raises significant concerns regarding the completeness of the baseline hydrogeological assessment and whether all groundwater receptors and groundwater flow pathways have been identified.

Without identifying and assessing these existing groundwater receptors, the applicant has not demonstrated that the proposed development would avoid adverse effects on groundwater resources relied upon for agricultural purposes. Nor has it demonstrated that potential changes to groundwater quantity, groundwater quality or spring discharge have been adequately assessed.

The applicant should therefore be required to identify and map all existing springs, wells and other groundwater receptors within the zone of influence of the proposed development, establish their hydraulic relationship with the proposed works, and demonstrate that the construction and operation of the development will not adversely affect groundwater resources or connected surface waters.

2.3 Failure to survey the applicant's hydrogeological receptors on Saddle Hill

A substantial section of the northern slopes of Saddle Hill forms part of our family landholding. To the best of our knowledge, this area was not surveyed by the applicant during the preparation of the Environmental Impact Assessment Report under any of the relevant environmental disciplines, including hydrology, hydrogeology, geology or ecology. The portion of Saddle Hill on which Turbine T3 is proposed forms part of the same continuous limestone karst landscape that extends onto our family lands.

This area contains numerous karst features, including multiple swallow holes, exposed limestone outcrops and groundwater recharge points. The swallow holes occur around much of the circumference of Saddle Hill and represent important components of the local karst drainage system, providing direct pathways for surface water to enter the underlying groundwater network.

These features are of particular importance because groundwater recharge through swallow holes influences the movement of groundwater within the karst aquifer and may contribute to springs and groundwater-fed watercourses located downslope of the proposed development, including those identified in Sections 2.1 and 2.2.

Despite their apparent significance, these swallow holes and recharge features do not appear to have been comprehensively identified, mapped or assessed within the submitted Hydrology and Hydrogeology chapters of the EIAR. Nor has the applicant demonstrated that this part of Saddle Hill was surveyed to establish the extent of karst features or groundwater recharge pathways.

The omission is significant because the proposed development includes extensive excavation for turbine foundations, crane hardstands, access tracks, cable trenches and interceptor drains within a karst limestone environment. Without a comprehensive survey of groundwater recharge features on Saddle Hill, it cannot be concluded that the site's hydrogeological conceptual model accurately represents groundwater flow paths or that all potential pathways for sediment or contaminant transport have been identified.

When considered alongside the omission of the groundwater-fed watercourse described in Section 2.1 and the failure to identify existing springs and wells described in Section 2.2, these issues raise serious concerns regarding the completeness of the baseline hydrogeological assessment. The Board cannot be satisfied that the applicant has adequately characterised the groundwater system on Saddle Hill or demonstrated that the proposed development would not adversely affect groundwater resources, connected surface waters or downstream designated sites.

The applicant should therefore be required to undertake a comprehensive survey of the karst features on Saddle Hill, including swallow holes, groundwater recharge points and other hydrogeological features, and to revise the hydrogeological assessment where necessary before the application can be properly determined.

Conclusion – Adequacy of the hydrology and hydrogeology assessment

The issues identified in Sections 2.1 to 2.3 raise significant concerns regarding the adequacy and completeness of the baseline information used to prepare the Hydrology and Hydrogeology chapters of the EIAR.

These issues include:

- the complete omission of a permanent groundwater-fed watercourse approximately 750 metres in length, which provides a direct hydrological connection between Saddle Hill, the Ballagh River and the downstream **Lough Melvin Special Area of Conservation**;
- the failure to identify and assess at least six perennial groundwater springs and associated wells on our lands at Shasmore and Lisdarush, all of which are currently used as livestock water supplies;
- the apparent failure to survey part of Saddle Hill within our family ownership, where numerous swallow holes, groundwater recharge points and other karst features are present which have a direct hydrological connection to the Ballagh River, and
- the resulting failure to fully characterise the groundwater flow regime, groundwater receptors and hydrological pathways associated with the proposed development.

These omissions are particularly significant because the proposed development is located within a karst limestone environment, where groundwater movement is governed by complex networks of fractures, fissures and swallow holes. In such settings, a comprehensive understanding of groundwater recharge, groundwater emergence, surface-water connectivity

and groundwater-dependent receptors is fundamental to the assessment of likely environmental effects.

The purpose of the baseline hydrological and hydrogeological assessment is to identify all relevant water receptors and establish the conceptual model upon which impact assessment and mitigation measures are based. Where significant groundwater features and receptors have not been identified or assessed, the resulting assessment of likely impacts and the effectiveness of proposed mitigation measures cannot be regarded as fully reliable.

Taken together, the omissions identified in this submission call into question whether the applicant has adequately characterised the hydrological and hydrogeological environment of Saddle Hill. Without a complete understanding of groundwater recharge features, springs, perennial watercourses and their hydraulic connectivity, the Board cannot be satisfied that the likely impacts of the proposed development on groundwater resources, surface waters, private water supplies or downstream designated sites have been properly assessed.

Accordingly, the applicant should be required to undertake a comprehensive review of the hydrological and hydrogeological baseline, incorporating all groundwater-fed watercourses, springs, wells, swallow holes and other karst features within the zone of influence of the proposed development. The impact assessment and associated mitigation measures should then be revised to reflect this verified baseline before the application can be properly determined.

3. Landslides, Peat Stability and Geology

3.1 Misrepresentation of the proximity of proposed earthworks to Our Family Home

Throughout the planning application, the Environmental Impact Assessment Report (EIAR) and correspondence with nearby residents, the applicant states that **our family home** is located approximately **784 metres** from proposed Turbine T3. This distance appears to have been measured from the centre point of the turbine to the centre point of our home.

However, the principal construction activities associated with Turbine T3 will not occur at the turbine centre. They will occur across the turbine foundation, crane hardstand, access tracks, cable trenches, interceptor drains and associated excavation works.

Based on the applicant's submitted drawings, the nearest edge of the proposed T3 hardstand is approximately **610 metres** from the centre of our family home. The separation distance to the nearest external wall of our home is less again.

Accordingly, the repeated reference to a separation distance of 784 metres materially overstates the actual separation between our family home and the principal construction works associated with Turbine T3. This distinction is important because the potential effects associated with excavation, drainage and earthworks arise from the engineering works themselves rather than from the centre point of the turbine.

Where the EIAR relies upon the stated separation distance in describing the proximity of our home to the proposed development, the Board should be satisfied that the assessment reflects the nearest extent of the proposed engineering works rather than the turbine centre.



Figure 3.1 *Photo showing proximity of our home to Saddle Hill (T3)*

3.2 High Landslide susceptibility identified in the applicant's Own assessment

Figure 9 (*Landslide Susceptibility Map*) contained within **Appendix 7-1 – Peat Stability Risk Assessment** identifies an area of **high landslide susceptibility** on the western slopes of Saddle Hill.

Based on the applicant's mapping, this area extends lies immediately downslope of the proposed development, including the engineering works associated with Turbine T3 and to within approximately **200 metres our family home**.

The applicant's own assessment therefore recognises that parts of Saddle Hill are susceptible to landslide occurrence. This is particularly relevant given the extensive excavation proposed for turbine foundations, crane hardstands, access tracks, cable trenches, drainage works and associated earthworks within the same hillside environment.

While the EIAR concludes that the overall peat stability risk is acceptable, it is not clear whether this conclusion has been reached using a complete and accurate understanding of the geological and hydrogeological conditions on Saddle Hill.

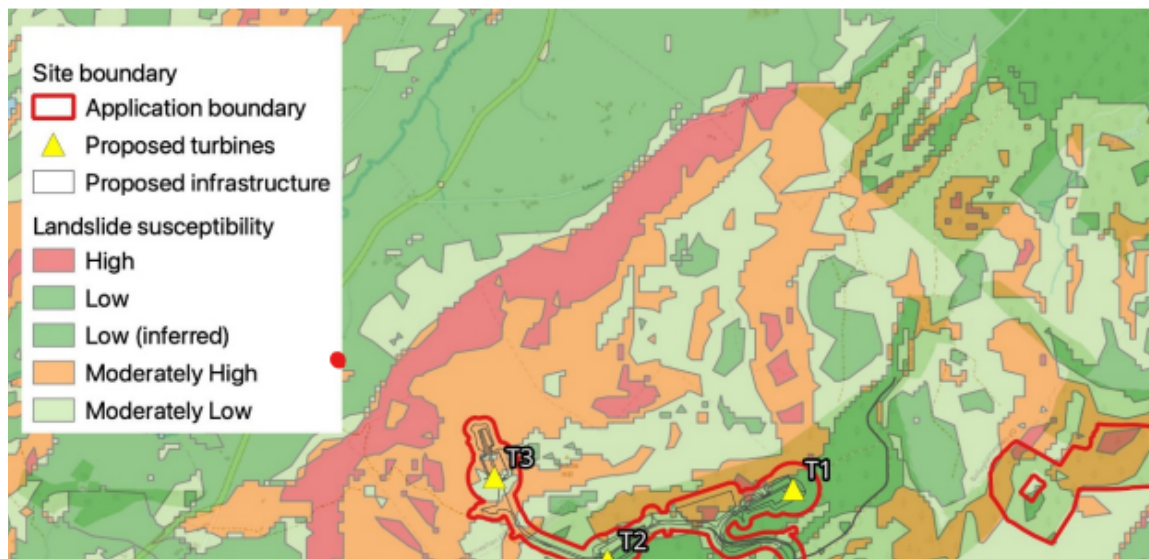


Figure 3.2 Figure 9 (Landslide Susceptibility Map) contained within Appendix 7-1 – Peat Stability Risk Assessment. Note our home marked with red dot.

3.3 Adequacy of the geological and hydrogeological baseline

As outlined elsewhere in this submission, a number of significant geological and hydrogeological features appear not to have been identified or incorporated into the baseline assessment. These include:

- the omission of *The Seven Rooms* cave system immediately adjacent to the proposed T3 hardstand;
- the apparent failure to identify numerous swallow holes and groundwater recharge features around Saddle Hill;
- the omission of a permanent groundwater-fed watercourse approximately **750 metres** in length;
- the failure to identify and assess at least six perennial springs and associated wells at Shasmore and Lisdarush; and
- the apparent failure to survey part of Saddle Hill, where numerous karst features occur.

These features are not isolated observations. They are all components of the same karst groundwater system and are directly relevant to understanding groundwater movement, subsurface drainage, slope stability and the interaction between excavation works and the underlying geology.

The proposed development includes substantial excavation for turbine foundations, crane hardstands, access roads, cable trenches, interceptor drains and other associated

infrastructure. The potential effects of these works can only be properly assessed where the geological and hydrogeological baseline accurately characterises the site.

The apparent omission of significant karst features and groundwater pathways raises concerns regarding whether the conceptual geological and hydrogeological model used to inform the Peat Stability Risk Assessment adequately reflects the conditions that exist on Saddle Hill.

Conclusion – Adequacy of the land, soils and geology assessment

The issues identified above raise significant concerns regarding the adequacy of the baseline information used to prepare the **Land, Soils and Geology** chapter of the EIAR and the accompanying **Peat Stability Risk Assessment**.

These concerns include:

- the repeated use of a turbine centre-to-home distance that does not reflect the true proximity of the proposed engineering works to our family home;
- the identification, within the applicant's own assessment, of an area of high landslide susceptibility extending to within approximately 200 metres of our family home;
- the omission of significant karst features, including *The Seven Rooms* cave system;
- the apparent failure to identify numerous swallow holes and groundwater recharge features on Saddle Hill;
- the omission of a permanent groundwater-fed watercourse;
- the failure to identify existing springs and wells that constitute groundwater receptors; and
- the apparent failure to survey part of Saddle Hill that contains numerous karst features.

The proposed mitigation measures for land stability, peat stability and groundwater protection are dependent upon an accurate understanding of the geological and hydrogeological environment. Where the baseline information is incomplete or inaccurate, the assessment of potential impacts and the effectiveness of the proposed mitigation measures cannot be regarded as fully reliable.

In these circumstances, the Board cannot be satisfied that the applicant has adequately characterised the geological and hydrogeological conditions on Saddle Hill or demonstrated that the proposed development would not give rise to unacceptable risks associated with excavation, drainage, peat stability or slope stability.

The applicant should therefore be required to review and verify the geological and hydrogeological baseline, incorporating all relevant karst features, groundwater pathways and groundwater receptors, and to revise the Land, Soils and Geology assessment and Peat Stability Risk Assessment where necessary before the application can be properly determined.

4. Landscape and Visual Impact

4.1 VP8 Does not provide a representative assessment of the visual impact on Our Family Home

Chapter 13 of the Environmental Impact Assessment Report (EIAR) concludes that the landscape and visual effects of the proposed development are acceptable. However, the visual assessment relating to proposed Turbine T3 does not accurately represent the likely visual effects on our family home and neighbouring dwellings.

The principal viewpoint used to assess the visual impact of Turbine T3 on nearby residential properties is **Viewpoint VP8**. In the submitted photomontage, mature foreground vegetation obscures the lower section of Turbine T3 together with our family home and neighbouring houses. As a result, the photomontage does not allow the Board to properly appreciate the true scale, proximity or visual dominance of the proposed turbine when viewed from nearby residential properties.

The proposed engineering works associated with Turbine T3, including the hardstand and foundation, are substantially closer to our home than the distance repeatedly quoted by the applicant. Yet the nearest representative photomontage does not clearly illustrate the relationship between these works, the turbine and the surrounding homes.

Recognising this limitation, we requested that the applicant prepare an additional photomontage from a viewpoint that more accurately represented the relationship between Turbine T3 and our family home. To assist the applicant, we supplied photographs showing clear views towards the proposed turbine location from the surrounding area.

Despite this request and the information provided, the applicant declined to prepare any revised or additional photomontages.

In these circumstances, VP8 cannot reasonably be regarded as a representative illustration of the likely visual effects of Turbine T3 on our family home and neighbouring residents. The Board should therefore exercise caution in relying upon this viewpoint when assessing the visual impacts of the proposed development.



Figure 4.1 Photomontage VP8, vegetation on right hand side blocking view of T3 base and family homes in Shasmore.

4.2 Cumulative visual impact with the existing Faughary Wind Farm

Our family home is located approximately **1.2 kilometres** from the existing **Faughary Wind Farm**, and we are therefore familiar with the visual presence of wind turbines within the local landscape.

However, the proposed turbines are not directly comparable with the existing development.

The existing turbines are approximately **125 metres** in overall height and represent an earlier generation of turbine design with significantly smaller rotor diameters. By comparison, the proposed turbines would have a maximum blade tip height of approximately **185 metres** and a rotor diameter of approximately **168 metres**, resulting in substantially longer blades, a much greater swept area and a markedly different visual appearance.

The visual effects of modern wind turbines are influenced not only by overall height but also by rotor diameter, blade length and the scale of blade movement. The proposed turbines would occupy considerably more of the skyline, introduce substantially larger moving blades and present a significantly more dominant visual feature than the existing turbines at Faughary.

While the EIAR includes a cumulative landscape and visual assessment, the photomontages and visualisations do not adequately illustrate the significant differences in scale, proportions and visual character between the existing and proposed turbines. Consequently, the submitted visual material does not provide a realistic representation of the cumulative visual effects that would be experienced by nearby residents.

The existence of the Faughary Wind Farm should not be taken to imply that substantially larger turbines would have similar visual effects. The proposed development represents a significant increase in turbine height, rotor diameter and overall visual presence,

fundamentally altering the character of the local landscape experienced from our family home.

4.3 Adequacy of the landscape and visual assessment

Photomontages and representative viewpoints are fundamental components of a Landscape and Visual Impact Assessment, enabling the Board and members of the public to understand the likely visual effects of a proposed development.

Where the principal viewpoint closest to our family home obscures both the lower section of the proposed turbine and the nearby residential properties, it does not provide a representative basis for assessing the visual relationship between the development and those most directly affected.

The refusal to prepare a revised photomontage, despite a specific request and the provision of suitable photographs, has further limited the ability of the Board to fully assess the likely visual effects of Turbine T3.

When considered together with the substantial increase in turbine height, rotor diameter and blade sweep compared with the existing Faughary Wind Farm, the submitted visual assessment does not adequately demonstrate the likely visual dominance of the proposed turbines or their cumulative impact on nearby homes.

Conclusion – Adequacy of the landscape and visual impact assessment

The concerns identified above raise questions regarding whether the Landscape and Visual Impact Assessment provides a fair and representative assessment of the likely visual effects of the proposed development on nearby residents.

In particular:

- the principal viewpoint used to assess Turbine T3 (VP8) does not provide an unobstructed or representative view of the relationship between the proposed turbine and our family home;
- the applicant declined to prepare a more representative photomontage despite a specific request and the provision of supporting photographs;
- the submitted visualisations do not adequately illustrate the true proximity of the proposed engineering works to our home; and
- the cumulative assessment does not fully convey the substantial differences in height, rotor diameter, blade movement and overall visual scale between the existing Faughary Wind Farm and the proposed development.

Accordingly, the Board cannot be satisfied that the submitted visual material fully represents the likely visual effects of the proposed development on our family home and neighbouring properties. A more representative visual assessment should be provided before the landscape and visual effects of the proposal can be properly evaluated.

5. Noise and Vibration.

5.1 Failure to demonstrate compliance with the Institute of Acoustics Good Practice Guide

The baseline noise survey contained within Appendix 9-3 forms the basis of the operational noise assessment presented in Chapter 9 of the EIAR. Having reviewed the report and its supporting appendices, we identified numerous inconsistencies relating to the monitoring equipment, monitoring locations and supporting documentation.

The Institute of Acoustics publication **A Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise** (May 2013) (IOA GPG) sets out recognised good practice for baseline wind turbine noise surveys. The guidance places particular emphasis on the accurate identification of monitoring locations, calibration of measurement equipment, and comprehensive supporting documentation to ensure that baseline measurements are transparent and verifiable.

The issues identified below raise concerns regarding whether the submitted baseline survey documentation demonstrates compliance with those principles.

5.2 Calibration of noise monitoring equipment

Section 2.4 of Appendix 9-3 identifies the sound level meters used during the baseline survey. However, comparison of the equipment list with the calibration certificates contained in Appendix D identifies a number of apparent inconsistencies.

In particular:

- no calibration certificate appears to be provided for the **RION NL-52 Sound Level Meter, Serial No. 164426**, identified as being used at **NML-5**;
- no calibration certificate appears to be provided for the **RION NL-52 Sound Level Meter, Serial No. 564809**, identified as being used at **NML-8** and **NML-10**;
- Appendix D contains duplicate calibration certificates for **NL-52 Serial No. 586940** and **NL-52 Serial No. 186668**, while certificates for other instruments identified within the survey appear to be absent;
- the survey states that measurements were check-calibrated using a **Brüel & Kjær Type 4231 Sound Level Calibrator**, yet no serial number for this calibrator is provided and no corresponding calibration certificate appears within Appendix D.

The IOA Good Practice Guide recommends that measurement systems and field calibrators are independently calibrated within specified time periods and that appropriate calibration records are maintained. On the basis of the documentation submitted, it is difficult to verify that the instruments identified within the survey are supported by the corresponding calibration certificates.

The applicant should therefore clarify the equipment actually used during the survey, provide the corresponding calibration certificates for each instrument and calibrator, and demonstrate that the baseline measurements relied upon in the Noise Impact Assessment are supported by appropriate calibration records.

5.3 Errors and inconsistencies in monitoring locations

A review of Appendix 9-3 also identifies numerous inconsistencies between monitoring locations, ITM coordinates, house references and supporting photographs.

These include:

- discrepancies between house reference numbers assigned to monitoring locations in Chapter 9 and those listed within Appendix 9-3;
- incorrect ITM coordinates associated with a number of monitoring locations;
- duplicate photographs for **NML-2** and **NML-6**;
- no location photograph for **NML-4**;
- apparent mismatches between monitoring photographs, house references and ITM coordinates for **NML-8**, **NML-9**, **NML-10** and **NML-11**.

Monitoring locations are fundamental to the baseline survey. Accurate coordinates, installation photographs and receptor identification are necessary to enable independent verification that representative locations were selected and that the correct data has been assigned to each receptor.

The cumulative number of discrepancies identified raises concerns regarding the quality assurance procedures applied during preparation of the report.

5.4 Representativeness of monitoring location NML-9

Monitoring Location NML-9 appears to have been positioned behind two substantial rows of mature trees together with an agricultural shed in the direction of Saddle Hill, the existing Faughary Wind Farm and the proposed Turbine T3.

These physical features provide significant screening between the monitoring equipment and the principal direction of the existing and proposed wind turbines.

The EIAR does not explain whether the influence of these screening features was considered when selecting the monitoring location or whether the location is representative of the acoustic environment experienced at the associated dwelling.

To assist the Board, we have included photographs illustrating the extent of the intervening vegetation and buildings surrounding the monitoring location.

The applicant should clarify why this location was selected and demonstrate that it provides a representative basis for the assessment of wind turbine noise.

Appendix Figure B-9. Location NML-9 Installation



Figure 5.1 *Photo of location of NML-9 used in Appendix 9 Background Noise Survey*



Figure 5.2 *Google Map snippet showing broader view of NML-9 location.*



Figure 5.3 Google Map snippet showing broader view of NML-9 location. Note double row of mature trees between NML-9 and Saddle Hill/Faughary Wind Farm.

5.5 Apparent inclusion of text from another survey

Appendix 9-3 contains the following statement:

"Both locations, B and C, were moved on 20 August 2019 to accommodate cattle in their previous measurement positions..."

No monitoring locations identified as **B** or **C** are used elsewhere in the report, with all monitoring positions identified using the **NML** numbering system.

Furthermore, the reference to **20 August 2019** does not appear consistent with the survey programme described within the report.

This text appears unrelated to the remainder of the document and may have been carried over from another survey or an earlier assessment. While this may represent an editorial oversight, it raises further concerns regarding the review and quality assurance procedures applied before submission.

Conclusion – Adequacy of the noise assessment

The issues identified above do not necessarily demonstrate that the predicted operational noise levels are incorrect. However, they do raise significant concerns regarding the completeness, accuracy and quality assurance of the baseline documentation upon which the Noise Impact Assessment has been prepared.

Taken together, the apparent omissions in calibration records, inconsistencies between monitoring locations, house references, ITM coordinates and photographs, questions regarding the representativeness of monitoring location NML-9, and the inclusion of text apparently relating to another survey reduce confidence in the reliability of the submitted baseline information.

Environmental Impact Assessment relies upon accurate, transparent and verifiable baseline data. Where numerous inconsistencies are identifiable through examination of the submitted documentation, it is reasonable to question whether the Noise Impact Assessment has been subject to an adequate level of technical verification prior to submission.

Accordingly, the applicant should be required to review the baseline noise survey, verify all monitoring locations, equipment records, calibration documentation, ITM coordinates, photographs and receptor references, explain the discrepancies identified in this submission, and confirm that the predictive noise assessment has been prepared using accurate and site-specific baseline information before the Board places reliance upon its conclusions.

6. Biodiversity

6.1 Protected and Notable Species recorded within the Ballagh River catchment

During **June 2026**, we recorded and photographed multiple adult **Marsh Fritillary** butterflies within damp, unmanaged grassland adjacent to the Ballagh River in the townland of Shasmore at approximately **ITM Coordinates X: 590984, Y: 845458**.

These observations are supported by geotagged photographs included below. One of these records has also been submitted to the **National Biodiversity Data Centre**.

The same locality also supports populations of **Broad-bordered Bee Hawk-moth** and **Common Frog**, both of which have been photographed.

The habitat is characterised by abundant **Devil's-bit Scabious**, the principal larval food plant of the Marsh Fritillary. The presence of multiple adult butterflies during the flight season, together with the abundance of this host plant, indicates that the surrounding area provides suitable habitat for the species and may support a local breeding population.

This habitat lies approximately **1.1 kilometres downstream** of the proposed Turbine T3 works and is situated on the banks of the Ballagh River.

As set out in **Section 2** of this submission, we have identified a perennial groundwater-fed watercourse that has been omitted from the applicant's hydrology assessment. That watercourse originates on Saddle Hill, flows beneath the R282 and discharges into the Ballagh River upstream of this habitat. We have also identified numerous swallow holes, springs and karst recharge features that do not appear to have been fully characterised within the EIAR.

Accordingly, the ecological value of this habitat cannot be considered independently of the hydrological system that supports it. If the hydrological baseline is incomplete, then the assessment of potential effects on downstream wet grassland habitats supporting protected and notable species may also be incomplete.

The applicant should therefore review these ecological records together with the omitted hydrological features identified in this submission and assess whether additional ecological assessment is required.



Figure 6.1 *Marsh Fritillary and Broad-bordered Bee Hawk-moth found in approximate location ITM Coordinates X: 590984, Y: 845458*



Figure 6.2 *Common frog found in approximate location ITM Coordinates X: 590984, Y: 845458*

6.2 Presence of Red Squirrels

Chapter 5 of the EIAR states that the desktop study identified no records of **Red Squirrel** within the study area during the previous ten years. The chapter also indicates that no evidence of Red Squirrels was recorded during the applicant's field surveys.

However, this does not reflect our experience as long-term residents, landowners and farmers in the townland of Shasmore.

We have observed Red Squirrels regularly within the townland over a number of years.

While the absence of desktop records does not necessarily indicate that a species is absent, the combination of no historical records and no field observations is difficult to reconcile with repeated local observations supported by photographic evidence.

These observations suggest that the ecological baseline presented in Chapter 5 may not fully reflect the current distribution of protected mammal species within the wider locality.

The applicant should therefore review these observations and consider whether they have implications for the ecological baseline.



Figure 6.3 *Squirrel in tree outside our home in Shasmore in June 2025*

6.3 Adjacent Biodiversity-Rich lands were not surveyed

Our family owns lands in the townlands of Shasmore and Lisdarush immediately adjoining the proposed development.

These lands extend to within approximately **200 metres** of the proposed **Turbine T3**, approximately **200 metres** of **Turbine T1**, and **Borrow Pit 01**.

To the best of our knowledge, these adjoining lands were not included within the applicant's ecological field surveys, despite their close proximity to several key elements of the proposed development.

Unlike intensively managed agricultural land, these fields comprise relatively unimproved grassland that has not been subject to intensive agricultural improvement or overgrazing. As a result, they support a diverse range of native flora and fauna.

The lands immediately adjoining the proposed development also participate in the **Department of Agriculture, Food and the Marine ACRES (Agri-Climate Rural Environment Scheme)** and are actively managed to promote and enhance biodiversity through appropriate environmental management measures.

These lands also lie within the hydrological catchment discussed in **Section 2** of this submission. We have identified omitted perennial watercourses, springs, swallow holes and karst recharge features that provide hydrological connectivity between Saddle Hill, the Ballagh River and downstream habitats.

Given their immediate proximity to Turbines T1 and T3, Borrow Pit 01 and associated construction activities, together with their management under the ACRES scheme, it is difficult to understand why these adjoining habitats do not appear to have been included within the ecological field surveys.

The applicant should therefore clarify the extent of the ecological survey area, explain why these adjoining biodiversity-rich lands were excluded from field survey, and demonstrate that the ecological baseline adequately characterises habitats immediately adjoining the proposed development.

6.4 Protected mammals

Over many years of farming and managing our lands in Shasmore and Lisdarush, we have regularly observed **Badger, Pine Marten, Fox, and Irish Mountain Hare**.

Of particular significance is the presence of multiple Badger setts on our lands. One well-established and active sett is located at approximately **ITM Coordinates X: 591767, Y: 844737**, approximately **470 metres** from the centre of the proposed Turbine T3.

The sett exhibits clear evidence of continued occupation and activity and is supported by dated photographic records included with this submission.

The presence of an active Badger sett demonstrates that protected mammals utilise lands in close proximity to the proposed development and that these adjoining lands form part of the wider ecological network surrounding the site.

To the best of our knowledge, these adjoining lands were not included within the applicant's ecological field surveys despite their proximity to Turbines T1 and T3 and Borrow Pit 01.

While these observations do not, in themselves, demonstrate that the proposed development will adversely affect the sett they indicate that protected mammals are present within the wider receiving environment and should be adequately reflected within the ecological baseline.

The applicant should therefore clarify whether ecological surveys extended to adjoining lands supporting protected mammals. The applicant should demonstrate that the ecological

assessment adequately characterises protected mammal populations surrounding the proposed development.



Figure 6.4 *Badger sett in location ITM Coordinates X: 591767, Y: 844737, approximately 470 metres from the centre of the proposed Turbine T3.*

Conclusion – Adequacy of the ecological baseline

The matters outlined above raise concerns regarding whether the ecological baseline presented in Chapter 5 fully characterises the biodiversity of the receiving environment.

Photographic evidence confirms the presence of Marsh Fritillary, Broad-bordered Bee Hawk-moth, Common Frog and Red Squirrel within the locality, while our lands also support active Badger setts and are regularly used by Badgers, Pine Martens, Foxes and Mountain Hares.

In addition, biodiversity-rich lands immediately adjoining the proposed development, including lands managed under the **ACRES** scheme, do not appear to have been included within the ecological field surveys despite their proximity to Turbines T1 and T3 and Borrow Pit 01.

These ecological observations should also be considered alongside the hydrological concerns identified in **Section 2**. Where the hydrological baseline may be incomplete due to the apparent omission of perennial watercourses, springs and karst recharge features, the assessment of downstream ecological receptors dependent upon those hydrological pathways may likewise require further consideration.

Taken together, these matters raise legitimate questions regarding whether the ecological baseline adequately reflects the habitats and protected species present within the wider

receiving environment. The applicant should therefore review the ecological assessment in light of the evidence presented in this submission and demonstrate that the EIAR provides a complete and accurate assessment of biodiversity that may be affected, directly or indirectly, by the proposed development.

7. Shadow Flicker

7.1 Inadequate assessment of the topographical relationship between Turbine T3 and Our Home

Chapter 10 of the EIAR concludes that shadow flicker can be effectively managed through predictive modelling and operational mitigation. However, we are concerned that the assessment does not adequately demonstrate how the exceptional topographical relationship between Turbine T3 and our home has been incorporated into the modelling.

Throughout the planning application and correspondence, the applicant consistently states that our home is located approximately **784 metres** from Turbine T3. This distance is measured from the centre of the turbine. In reality, the nearest edge of the proposed hardstand and associated construction works will be substantially closer, at approximately **610 metres** from our home.

Our home is located at approximately **215 metres Above Ordnance Datum (AOD)**, while the proposed Turbine T3 platform is situated on Saddle Hill at approximately **290 metres AOD**. The proposed turbine has a maximum blade tip height of **185 metres**, resulting in a maximum blade tip elevation of approximately **475 metres AOD**. Consequently, the rotating blades will reach an elevation approximately **260 metres higher than our home**.

This represents an unusual topographical relationship in which an exceptionally large turbine is positioned on elevated ground immediately above a nearby dwelling. The EIAR does not clearly demonstrate how this geometry has been incorporated into the shadow flicker modelling or whether the assessment adequately reflects the specific circumstances of our property.

Given the close proximity of Turbine T3 and the significant elevation difference between the turbine and our home, the applicant should demonstrate that the modelling accurately represents these site-specific conditions and that the conclusions reached are robust.

7.2 Reliance on operational mitigation rather than appropriate design

Chapter 10 proposes that any shadow flicker affecting nearby properties will be controlled through operational mitigation, including predictive modelling and automatic turbine shutdown using the wind farm's SCADA control system.

While operational controls may reduce periods of shadow flicker, they do not alter the physical relationship between Turbine T3 and our home. The proposed mitigation relies upon

intervention after conditions capable of generating shadow flicker have been identified rather than avoiding those conditions through an appropriate turbine layout and separation distance.

The need for an automated shadow flicker management system demonstrates that the applicant recognises that shadow flicker has the potential to occur at nearby dwellings and therefore requires active operational control throughout the lifetime of the development.

In my view, the Board should be satisfied that the proposed layout is appropriate in the first instance rather than relying primarily upon operational mitigation after the development becomes operational.

7.3 Lack of practical screening

Chapter 10 states that existing vegetation and local topography can reduce shadow flicker under real-world conditions.

However, there is no vegetation immediately surrounding our home that is capable of screening Turbine T3, nor is it realistic to suggest that effective screening could be established.

Because Turbine T3 will occupy substantially higher ground than our home, with a blade tip elevation of approximately **475 metres AOD** compared with approximately **215 metres AOD** at our dwelling, trees that could reasonably and safely be planted in the vicinity of our home would not attain sufficient height to screen a structure of this scale.

Consequently, there is no practical landscape mitigation available that would substantially reduce either the visual dominance of Turbine T3 or any associated shadow flicker experienced at or in our home.

7.4 Previous experience of shadow flicker

Our concerns regarding shadow flicker are not hypothetical.

We already experience shadow flicker from the nearest turbine within the existing Faughary Wind Farm. This demonstrates that our home is already susceptible to shadow flicker under certain meteorological and seasonal conditions.

The proposed development would introduce a substantially larger turbine, positioned considerably closer to our home than the existing Faughary turbines. Accordingly, the assessment should consider not only the predicted effects of Turbine T3 in isolation but also the cumulative experience of residents who already experience shadow flicker from existing wind energy infrastructure.

7.5 Cumulative residential impact

The proposed development cannot be considered in isolation. Our home is already located approximately **1.2 kilometres** from the existing Faughary Wind Farm, where we have experienced shadow flicker from the nearest turbine.

The proposed Turbine T3 would introduce a significantly larger turbine into the same viewshed. At **185 metres** in overall height and with a substantially greater rotor diameter than the existing turbines, it would represent a markedly different scale of development.

Accordingly, the Board should consider the cumulative effect of the existing and proposed wind farms on residential amenity, including repeated exposure to shadow flicker, the increased visual dominance arising from a much larger turbine on elevated ground, and the reliance on operational mitigation to address effects that may be experienced throughout the operational life of the development.

Conclusion

The shadow flicker assessment presented in Chapter 10 relies heavily on predictive modelling and operational mitigation. However, the applicant has not demonstrated that the assessment fully reflects the exceptional topographical relationship between Turbine T3 and our home or that the proposed mitigation provides an adequate substitute for an appropriate turbine layout.

Our home is significantly closer to the proposed operational infrastructure than is suggested by the headline distance repeatedly quoted throughout the application. It lies substantially below the proposed turbine on the slopes of Saddle Hill, where there is no realistic opportunity to establish effective landscape screening.

Furthermore, our previous experience of shadow flicker from the existing Faughary Wind Farm demonstrates that shadow flicker is already a real issue affecting our home.

For these reasons, we consider that the Board should carefully examine whether the assessment of shadow flicker fully reflects the particular circumstances of our home and whether the proposed layout of Turbine T3 represents an appropriate and acceptable form of development having regard to the protection of residential amenity.

8. Ornithology

8.1 Reduced survey history for the Turbine T3 area

Having reviewed the ornithological survey maps contained within Appendices 6-2 to 6-9 of the EIAR, we note that the area now occupied by the proposed Turbine T3 was not included within the ornithological survey area until 2023. Earlier survey coverage included the areas associated with proposed Turbines T1 and T2 but did not extend to the location of the current T3 site.

This is significant because Turbine T3 is the turbine located closest to our home and occupies a distinct area of Saddle Hill that appears to have been incorporated into the project at a later stage in its development.

The EIAR does not explain why the T3 area was added to the ornithological survey programme after the earlier survey years, nor does it discuss whether the reduced survey history for this part of the development affects the robustness of the ornithological baseline.

Given the importance of baseline survey information in assessing the potential impacts of wind farm development on bird populations, the applicant should clarify:

- when the Turbine T3 area was first incorporated into the project design;

- why this area did not form part of the earlier ornithological survey programme;
- whether additional surveys were undertaken to compensate for the reduced survey history; and
- whether the conclusions of Chapter 6 would differ had the Turbine T3 area been surveyed over the same duration as the remainder of the proposed development.



Figure 8.1 An example of map from Appendix 6-6 Breeding Bird Survey Report 2022 clearly showing Saddle Hill omitted from survey area



Figure 8.1 An example of map from Appendix 6-7 Breeding Bird Survey Report 2023 clearly showing Saddle Hill now included

8.2 Local Ornithological observations

As residents, landowners and active farmers in Shasmore, we have extensive familiarity with the birdlife of Saddle Hill and the surrounding upland habitats.

During **April and May 2026**, I recorded a singing **Eurasian Skylark** within the vicinity of the proposed Turbine T3 site. This observation was recorded using the Merlin Bird ID application and occurred during the breeding season in suitable upland grassland habitat.

We have also regularly recorded **Meadow Pipit** across Saddle Hill, Shasmore and Lisdarush Mountain, with counts of up to twenty individuals birds on one June evening this year. We have also seen and heard **Common Snipe** in the area during late summer in recent years. In addition, we regularly observe **Common Buzzard** over the area and recorded the **Common Cuckoo**, further indicating the continued use of these upland habitats by a range of bird species.

While we recognise that these observations do not replace systematic ornithological surveys, they demonstrate that the upland habitats surrounding the proposed Turbine T3 continue to support a diversity of bird species throughout the breeding season.

8.3 Conclusion

The purpose of these observations is not to dispute the applicant's professional ornithological surveys, but to highlight that the area surrounding the proposed Turbine T3 appears to have a

shorter ornithological survey history than other parts of the proposed development. Given the continued presence of a range of bird species recorded in and around Saddle Hill and the adjoining townland of Shasmore, we respectfully submit that the Board should be satisfied that the ornithological baseline for this part of the site is sufficiently robust before relying upon the conclusions of the EIAR.

9. Community Engagement and Future Land Use

9.1 Meaningful consultation with those most affected

The applicant states throughout the planning application that community engagement formed an important part of the project design process and that consultation informed the evolution of the proposed wind farm.

However, our experience as one of the nearest affected households contradicts this assertion and raises questions as to whether the consultation process provided a genuine opportunity for those most directly affected to engage with or influence the design process.

Having reviewed the application documentation, it appears that the area now occupied by Turbine T3 was included within the ornithological survey programme from 2023 onwards. Despite this, we were not made aware that Turbine T3 was proposed in its present location until the publication of the project brochure in March 2026.

The March 2026 project brochure itself did not allow nearby residents to properly understand the relationship between the 14 Turbines and existing homes. The layout was presented on an outdated base map that predated the construction of our dwelling, meaning our home was not shown. Furthermore, the brochure did not provide the precise ITM coordinates of any turbine, including T3. As a result, we were required to contact the applicant directly to obtain the exact Turbine T3 coordinates before we could accurately determine its location relative to our home.

This is significant because Turbine T3 is the turbine that will have the greatest impact on our home and family life.

In the EIAR the applicant repeatedly refers to our dwelling as being approximately 784 metres from the centre of Turbine T3. However, the nearest edge of the proposed hardstand and associated construction infrastructure is substantially closer, at approximately 610 metres from our home.

Although the applicant may point to visits by Community Liaison Officers (CLOs), the provision of contact details and invitations to raise questions, these measures alone do not demonstrate meaningful consultation.

Meaningful engagement depends not only upon opportunities to ask questions, but upon being provided with sufficient information, at a sufficiently early stage, to understand what questions need to be asked and to allow local knowledge to influence the evolving design.

Prior to March 2026, we had no reason to believe that the turbine closest to our home would be located on Saddle Hill in its present position. Without that knowledge, it was impossible for us to raise concerns regarding the proximity of Turbine T3 to our home, the associated hardstand, groundwater features, archaeology, caves, swallow holes, biodiversity, shadow flicker, landscape impacts and the cumulative effects that now form the basis of this submission.

Despite not knowing the proposed location of Turbine T3, we nevertheless engaged constructively with the consultation process. We raised concerns regarding local wildlife, our experience of shadow flicker and noise from the existing Faughary Wind Farm, the history of landslides in the area, and other matters affecting the local environment. However, without accurate information identifying the location of Turbine T3, we could not reasonably be expected to comment on the specific environmental and residential impacts that are now evident from the planning application.

We attended the applicant's information clinic, by appointment, at Rossinver Community Centre on 31 March 2026, where we provided detailed feedback on the matters now raised throughout this submission. However, by that stage the planning application was already prepared for lodgement. Consequently, there was no realistic opportunity for our observations to influence the project layout, environmental assessments or supporting documentation before the application was submitted.

Had the proposed location of Turbine T3 been disclosed to nearby residents at an earlier stage, we could have identified a number of important environmental features including perennial springs, groundwater-fed watercourses, swallow holes, cave systems, biodiversity features and archaeological observations that we believe have not been adequately reflected within the EIAR and Natura Impact Statement.

9.2 Design evolution of Turbine T3

The application states that community consultation influenced the design process. However, the documentation does not clearly explain how that process resulted in the introduction of Turbine T3 in a location substantially closer to existing homes than earlier publicly available layouts.

The application does not identify:

- when the present location of Turbine T3 was first selected;
- what alternative locations were considered;
- why this location was preferred;
- when nearby residents were informed that this location had been chosen; or
- how consultation feedback influenced the final decision.

Given the central importance of Turbine T3 to the impacts identified throughout this submission, a clearer explanation of the design evolution would assist the Board in understanding how the final layout was reached and whether reasonable alternatives were adequately considered.

9.3 Community engagement activities

The applicant undertook a range of community engagement initiatives during the development of the project, including public exhibitions, promotional material, visits to local schools and competitions involving schoolchildren.

While educational engagement is not objectionable in itself, meaningful consultation should prioritise those residents who are likely to experience the greatest environmental effects arising from a proposed development.

In our case, despite being among the nearest affected households, we were not informed of the proposed location of Turbine T3 until March 2026. This contrasts with the significant effort devoted to broader community engagement activities.

Meaningful consultation should ensure that those most directly affected are provided with sufficient information, at an early stage, to enable their local knowledge and observations to contribute to the environmental assessment before the design becomes fixed.

9.4 Future development potential of adjoining Lands

The proposed location of Turbine T3 has implications extending beyond its immediate effects on our existing home.

Our family has owned and farmed lands in Shasmore and Lisdarush for 60+years. These lands represent not only our livelihood but also the long-term future of our family.

The applicant has not considered whether the location of Turbine T3 could unnecessarily constrain the future use and development of adjoining privately owned lands.

Given the proximity of Turbine T3 to our lands, it is reasonable to question whether future planning proposals on adjoining property could be constrained because of considerations relating to residential amenity, noise, shadow flicker or other operational effects associated with the wind farm.

While any future planning application would be determined on its own merits, the EIAR does not assess whether the proposed layout could prejudice the reasonable future development potential of neighbouring lands or whether alternative layouts were considered that would reduce this long-term constraint.

9.5 Property value

Chapter 4 of the EIAR concludes that significant effects on property values are unlikely, relying principally upon published literature which reaches differing conclusions regarding the relationship between wind farms and residential property values. The chapter itself acknowledges that the 2023 Irish CERIS/University of Galway study identified a potential reduction in house values of approximately 14.7% for properties within 0–1 km of a wind turbine, while concluding that no significant reduction was identified beyond 1 km.

Our home differs from the broad scenarios discussed in those studies. It is located approximately 784 metres from the centre of Turbine T3 and approximately 610 metres from

the nearest construction footprint, with the turbine occupying an elevated position directly overlooking our property. As outlined elsewhere in this submission, the proposed development also gives rise to concerns regarding visual dominance, shadow flicker and residential amenity. These site-specific circumstances should be considered when assessing the overall effect of the proposal on our property.

Conclusion

The consultation process should have enabled those residents with the greatest knowledge of the receiving environment to contribute meaningfully before the project design and environmental assessments were finalised.

Instead, our principal opportunity to comment arose only after the proposed location of Turbine T3 had effectively been established and the planning application was already being prepared for submission.

This is particularly significant because many of the issues identified throughout this submission—including groundwater features, springs, swallow holes, cave systems, archaeological features, biodiversity records and residential amenity impacts—relate directly to local knowledge that could have informed the environmental assessment at an earlier stage.

For these reasons, I respectfully submit that the Board should carefully consider whether the consultation process achieved its stated objective of informing the evolution of the project design, particularly in relation to those residents who will experience the greatest effects from the proposed development.

Overall Submission Conclusion

Having carefully reviewed the Environmental Impact Assessment Report (EIAR), Natura Impact Statement (NIS) and the associated technical appendices submitted in support of this application, we respectfully submit that the documentation does not provide a sufficiently complete, accurate or reliable assessment of the receiving environment to enable An Coimisiún Pleanála to fully evaluate the likely environmental effects of the proposed development.

This submission has identified a recurring pattern of omissions, inaccuracies and inconsistencies across multiple technical disciplines. These concerns are not confined to a single chapter or topic but extend across archaeology, hydrology, geology, biodiversity, ornithology, landscape and visual assessment, noise, shadow flicker and community engagement.

Throughout this submission we have identified, among other matters:

- archaeological features, cave systems and karst features omitted from assessment;
- incorrect mapping and recording of archaeological monuments;
- omission of a perennial groundwater-fed watercourse extending approximately 750 metres, providing a direct hydrological pathway towards the Ballagh River catchment and ultimately Lough Melvin SAC;
- omission of perennial springs, wells and groundwater features relied upon by local landowners;
- incomplete assessment of swallow holes, karst hydrology and groundwater recharge on Saddle Hill;
- concerns regarding peat stability and the proximity of substantial excavation works to our home;
- visual assessments and photomontages that do not fully represent the relationship between Turbine T3 and nearby dwellings;
- numerous inconsistencies within the noise assessment, including incorrect monitoring locations, duplicated photographs, conflicting ITM coordinates and calibration documentation anomalies;
- biodiversity observations and habitats adjoining the proposed development that were not fully reflected within the ecological assessment;
- concerns regarding the completeness of the ornithological baseline surrounding Turbine T3; and
- questions regarding the evolution of Turbine T3 and whether meaningful consultation occurred at a stage when local knowledge could genuinely have aided and influenced the project design and environmental assessment.

Individually, some of these matters might be capable of clarification. Collectively, however, they reveal a recurring pattern of deficiencies that raises legitimate concerns regarding the reliability of the environmental baseline upon which the entire EIAR and Natura Impact Statement are founded.

The proposed development occupies an environmentally sensitive upland landscape characterised by limestone karst, swallow holes, cave systems, springs, groundwater recharge zones, archaeological monuments, protected habitats and direct hydrological connections to SAC sites. Such landscapes require particularly robust baseline surveys because unidentified environmental receptors or pathways may fundamentally alter the assessment of likely impacts.

Our family has lived and farmed these lands for 60+ years. The observations presented throughout this submission are not speculative concerns but are based upon a lifetime of direct experience of the receiving environment. The springs, wells, swallow holes, caves, watercourses, wildlife and archaeological features described within this submission form part of our everyday knowledge of the land. Many of these features have been documented through photographs, mapped coordinates, published research and field observations, yet several appear to have been omitted or inadequately assessed within the applicant's documentation.

Particular concern arises in relation to the siting of **Turbine T3**, which is central to many of the issues identified throughout this submission. As the turbine closest to our home, it is directly linked to concerns regarding archaeology, karst geology, groundwater, peat stability, biodiversity, landscape and visual impact, shadow flicker, residential amenity and the future use of adjoining family lands. The concentration of environmental issues associated with this single turbine location raises legitimate questions as to whether this part of the receiving environment has been fully understood or adequately assessed before the final layout was selected.

The Community Engagement chapter also raises an important related issue. While the applicant undertook various consultation activities, our detailed observations and local environmental knowledge could only be provided after the proposed location of Turbine T3 had effectively been established and the planning application was already prepared for lodgement. Had nearby residents been informed of this location at an earlier stage, important local knowledge concerning groundwater features, cave systems, archaeology, biodiversity and other environmental receptors could have been brought to the applicant's attention before the environmental assessments were finalised.

The purpose of the planning process is not simply to facilitate development but to ensure that development proceeds only where its environmental effects have been properly identified, assessed and, where necessary, avoided or mitigated. That process depends upon an accurate understanding of the receiving environment. Where important environmental features remain omitted, inaccurately recorded or insufficiently assessed, confidence in the conclusions of the EIAR and Natura Impact Statement is inevitably diminished.

Although this submission focuses primarily on Turbines T1, T2 and T3 and the surrounding lands—being the areas with which we have the greatest direct knowledge—the repeated nature of the omissions and inconsistencies identified across multiple disciplines raises broader questions regarding the reliability of the environmental assessment as a whole. The Board should therefore be satisfied that similar deficiencies do not arise elsewhere within the proposed development of Lissinagroagh Wind Farm before relying upon the conclusions reached in the EIAR and Natura Impact Statement.

For the reasons set out throughout this submission, I respectfully submit that An Coimisiún Pleanála cannot be satisfied, on the basis of the information before it, that the likely environmental effects of the proposed development have been fully identified and assessed.

Accordingly, we respectfully request that planning permission be **refused**. In the alternative, should the Board consider that the identified deficiencies are capable of being addressed, we respectfully submit that substantial further information should be required before the application can be properly assessed and determined in accordance with the requirements of Irish and European environmental law.

Finally, we wish to emphasise that this submission is not made in opposition to renewable energy as a principle. We recognise the importance of renewable energy in addressing climate change and supporting Ireland's energy transition. However, developments of this scale must be supported by complete, accurate and transparent environmental assessments. Our family has lived, farmed and cared for these lands for 60+years and will continue to act as stewards of this land for many years to come. The observations presented throughout this submission arise from that lifelong knowledge of the receiving environment and our obligation to protect it. We respectfully ask the Board to give careful consideration to the evidence presented before reaching its determination.

We confirm that the €50 fee accompanies this submission.

Yours faithfully,

Fabian and Donna McMorrow

Shasmore

Manorhamilton

Co. Leitrim

F91P2D3

05th July 2026