

Dear Sir/Madam

I am writing to make a formal observation for the planning application An Coimisiún Pleanála - **Case reference: PAX12.324290 for Lissinagroagh Wind Farm located in located in the townlands of Boleyboy, Cashelaveela, Cherrybrook, Killea, Coolodonnell, Faughary, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullyskeherny, County Leitrim by FuturEnergy Lissinagroagh DAC.**

As a native of, and frequent visitor to, Shasmore, Manorhamilton, Co. Leitrim, where my parents and family live, I wish to register my objection to planning approval for this development. My reasons are as follows.

1. Failure to follow best practice in the guidance contained in 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).

There are so many errors within the EIAR chapter 9 Noise and Vibration report, and associated appendices, that I have separated them into 3 subcategories.

- 1.1 Calibration of equipment used.
- 1.2 Choice of measurement locations and recording
- 1.3 Assigning background noise levels

1.1 Calibration of Equipment used.

In The background noise survey (Appendix 9-3) section 2.4 Instrumentation table 2-3 Details of Noise Measurement Instrumentation, the author states that a RION -NL-52 serial number 164426 was used at NML-5 (H0475), but no calibration certificate is provided in Appendix D for an NL52 serial number 164426.

In addition, no calibration certificate is provided in appendix D for RION – NL – 52 serial number 564809 used at NML-8 (H0046) and NML-10 (H1574).

Of the 7 Calibration Certificates supplied in appendix D, two are duplicates i.e. two certificates for NL-52 serial number 586940 and 2 certificates for NL-52 serial number 186668.

This would make any data supplied from sites NMLs 5, 8 & 10 invalid as per the IOA GPG for ETSU-R-97 methodology section 2.4 Noise Measuring Equipment which states.

“Systems should have independent calibration to manufacturer’s specification carried out no longer than two years prior to the survey completion date (one year for field calibrators). The system should be check calibrated on installation, at each battery change, at intervals of no longer than 4 weeks during the survey, and prior to removal from site. Check-calibration should be carried out using a Type 1 acoustic calibrator, subject to independent calibration annually. Remote calibration (e.g. mid-survey) is acceptable provided that the calibration system is equally compliant.”

With reference again to the above extract from The IOA GPG, field calibrators should have independent calibrations performed within ONE year prior to the survey completion.

A Brüel & Kjær type 4231 Sound Level Calibrator was used as Authors of the survey state in section 2.4 that “Before and after the survey the measurement apparatus was check calibrated using a Brüel & Kjær type 4231 Sound Level Calibrator where appropriate”.

There is no serial number provided for the Sound level calibrator used.

There is no Calibration Certificate in appendix D for the Sound Level Calibrator used.

In Appendix 9.4 BASELINE NOISE SURVEY FOR GRID CONNECTION, the author of that survey states

“The survey was conducted in general accordance with ISO 1996: 2017: Acoustics – Description, measurement and assessment of environmental noise.”

Section 5.3 of ISO 1996:2017 states that

5.3 Verification Compliance of the sound pressure level measuring instrument, the filters and the sound calibrator shall be verified by the existence of a valid certificate of compliance with the measurement parameters specified in the relevant test methods in IEC 61672-3[4], IEC 61260 and IEC 60942. All compliance testing shall be conducted by a laboratory meeting the requirements of ISO/IEC 17025 to perform the relevant tests and calibrations and ensuring

metrological traceability to the appropriate measurement standards. The recommended time interval for testing of system performance is once a year. The maximum allowable interval is 2 years.

In Appendix 9-4 The author records that a Sound Level Meter with serial number 2818091 and a Bruel & Kjaer Type 4231 calibrator were used. No Calibration certificates are provided for either device.

In Table A12-5-2. “Noise Monitoring Equipment” this sound level meter is referenced with a calibration date “November 2023”. The survey was performed on 2 December 2025.

This means the survey was performed with a device with no valid in date calibration certificate and, as such, invalidates the results of that survey.

1.2 Choice of measurement locations and recording

In EIAR chapter 9, section 9.4.2.1 “Choice of measurement locations” table 9.6: Noise Measurement Co-ordinates, 9 out of the 11 House reference numbers do not exist when cross checked with Appendix 4-1 List of Sensitive Receptors Within 2km.

Table 9-6: Location Reference (Closest NSL)	Co-ordinates (ITM)		Appendix 4-1 ID	Co-ordinates (ITM)	
	Easting	Northing		ITM_X	ITM_Y
NML-1 (H443)	589332	842725	443	590941.9767	838068.5718
NML-2 (H016)	594119	845340	No Record	No Record	No Record
NML-3 (H521)	594212	844226	No Record	No Record	No Record
NML-4 (H051)	595036	840903	No Record	No Record	No Record
NML-5 (H117)	591954	840734	No Record	No Record	No Record
NML-6 (H413)	589433	840908	No Record	No Record	No Record
NML-7 (H418)	589474	841471	No Record	No Record	No Record
NML-8 (H457)	590291	843336	457	590869.3899	839482.7054
NML-9 (H487)	591901	845796	No Record	No Record	No Record
NML-10 (H456)	589523	843746	No Record	No Record	No Record
NML-11 (H468)	590621	844573	No Record	No Record	No Record

Note when the distance between the errors in the co-ordinates are calculated, we get a difference, in a straight line, for NML-1 of approx. 5km. for NML-2 the error is approx. 4km.

In addition, the House reference numbers for the Noise Monitoring Locations (NML) in EIAR chapter 9, section 9.4.2.1 Choice of measurement locations table 9-6 are not the same as those for the same NMLs in Appendix 9-3 Background Noise Survey table 2.1.

In Appendix 9-3 table 2.1 and associated appendix B Installation photographs, there are the following errors.

NML 2: House reference is H0842, but the ITM co-ordinates provided (X 594119 Y 845340) are for H reference H0633 when cross checked to the ID in appendix 4-1. Also, the photo supplied for NML 2 in appendix B is a duplicate of NML 6 location photograph!

The Institute of Acoustics publication A Good Practice Guide to the Application of ETSU-R-97, section 2.5.10 states that “Photographs of the equipment showing its position relative to the dwelling or other conspicuous features should also be provided”.

NML 4: has no Location photograph in appendix B. This is quite concerning as this NML location is then being used by the author of the report to assign its background levels to determine derived Turbine Noise limits for other locations. See chapter 9 table 9-13.

NML 6: same photo used for NML 2 location.

NML 8: location photograph in appendix B8 is not correct for H0046.

NML 9: has been assigned H0501 as its nearest NSL. H0501 ITM co-ordinates are (X 590621 Y 844573) The photograph B-9 in appendix B shows the monitoring equipment in the garden of H0358 (ITM X 590584.2764 ITM Y 844754.3209) behind some trees. The ITM coordinates provided (X 591901 Y 845796) for this NML are for H1574.

NML 10: has been assigned H1574. The photograph B-10 is not correct for this house. Also, the ITM coordinates provided (ITM X 589523 ITM Y 843746) are for H0759. The ITM co-ordinates of H1574 are (X 591901 Y 845796)

NML 11: has been assigned H0759. The photograph B-11 provided is a photograph of H1574 which is the location of NML10. The ITM coordinates provided are for H0501 which is the location of NML9.

Any data used in the modelling of predictive noise curves from the above would be questionable. How can the authors of the noise survey, and subsequent analysis and modelling of predictive cumulative noise curves, say with certainty which NML location is correct for the data they have used.

Recording

The survey includes a bizarre statement in section 2.1 Measurement Locations

“Both locations, B and C, were moved on 20 August 2019 to accommodate cattle in their previous measurement positions. In both cases, the change in location was minor and did not significantly affect the measured noise levels.”

There is no reference to any location “B” or “C” in any of the documentation from the applicant that I can find in relation to this application. Furthermore, the “20 august 2019” is more than 2 years before the noise survey was performed!

1.3 Assigning background noise levels.

EIAR chapter 9 section 9.5.2.1 Assigning Representative Background Noise Levels table 9-13 again has all incorrect or non-existing house references for the assigned NMLs when cross checked with Appendix 4-1 List of Sensitive Receptors Within 2km.

With the addition that now H456 has been assigned as the NSL for NML-11 where before it was NML 10.

In table 9-13 “NML-4, this being the location with the lowest measured baseline noise levels.”. No photograph of NML4 location is provided for in Appendix B of Appendix 9-3 to show where this important Noise measuring device was located.

Conclusion

The author of the chapter 9 Noise and Vibration report in section 9.3.4.2 states

“The guidance contained within IOA GPG is considered to represent best practice and has been adopted in this assessment.”

I suggest, based on my findings that this statement is not true and does not comply with the Direction from An Coimisiún Pleanála to provide a EIAR Noise and Vibration Report to include appropriate background noise levels (account for cumulative effects as per current best practice GPG, ETSU-R-97 GPG) and rationale for same.

Nor does it comply with the request to provide Calibration Certificates

The report also fails to comply with the request from Leitrim Conty Council in chapter 15 of its consultation response.

“Any such noise impact assessments shall be in accordance with the 2006 Wind Energy Development Guidelines, pending their replacement, and should have regard to the more detailed methodology set out in the ‘Good Practice Guide [GPG] to the application of ETSU-R-97 for the Assessment and Rating of Wind Turbine”

My conclusion, based on what I have seen in the EIAR Chapter 9 Noise and Vibration report, is that it is not a robust report and I would ask that An Coimisiún Pleanála take the time to investigate the above issues, and other issues I may have missed, thoroughly and treat the report as not valid and therefore the application for the proposed windfarm as rejected.

2. T03

I object to the proposed 14 turbines because of their location on an upland peat bog and karst mountain. They will turn the beautiful area I know and love into an industrial landscape that completely changes the appearance of the area.

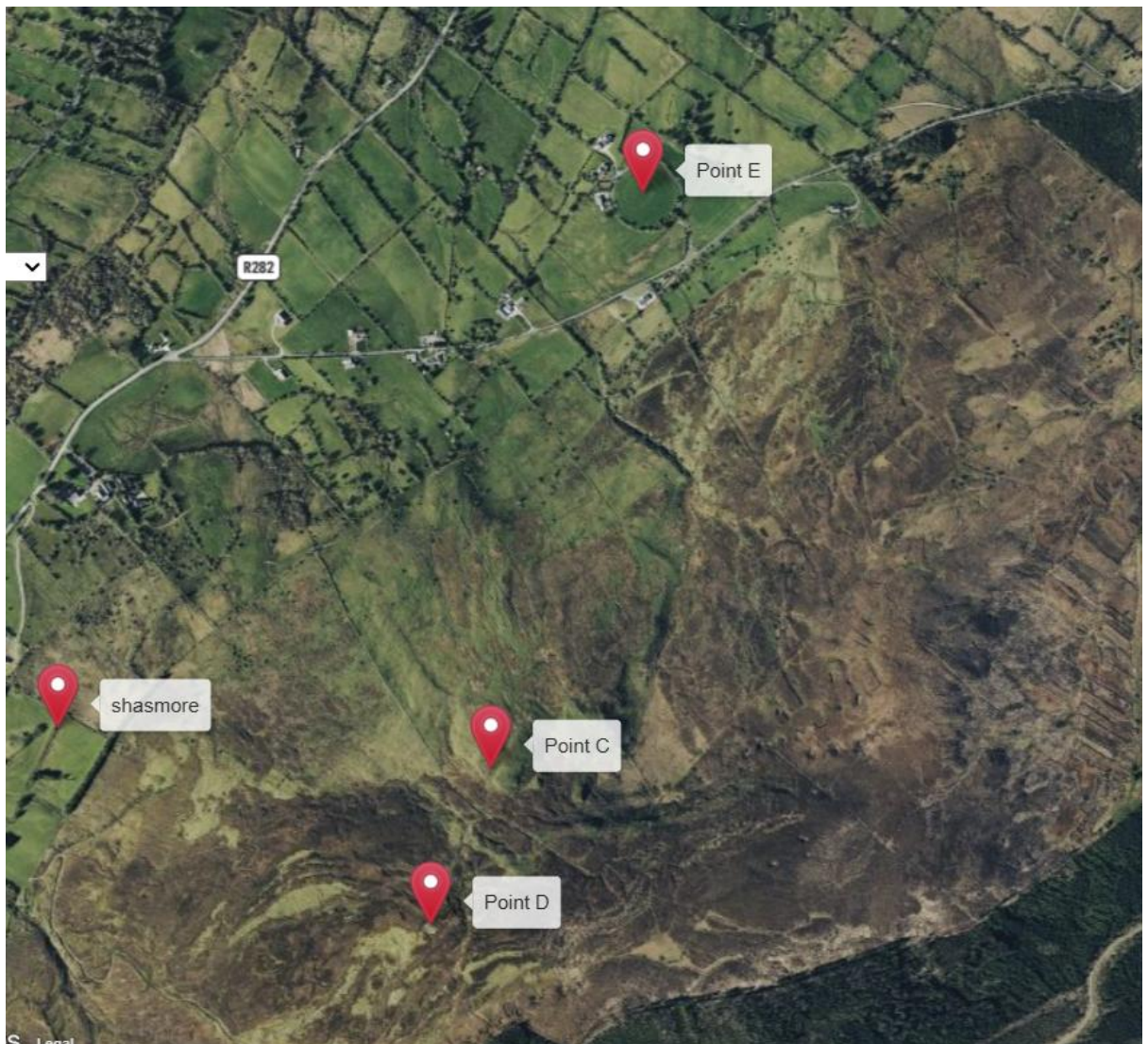
In particular, the proposed location of Turbine T03, is unsuitable for several reasons.

1.The water that comes from Saddle hill, makes its way to the Ballagh river and thereafter, into Lough Melvin from a water course that is unmarked on the

hydrology report. There is a bridge (ITM coordinates X 590569 Y 844642) which allows this water to flow under the R282 to the Ballagh river. This bridge is shown on 1935 OS 6-inch map, so it has been there for some time. This water course is not mentioned in the EIAR chapter 8 Hydrology report.

2. The risk of bog slide for the area around T03 is too large to dismiss, especially given the proximity to nearby houses.

3. As recognised in the EIAR chapter 14 ARCHAEOLOGICAL, ARCHITECTURAL AND CULTURAL HERITAGE report, the area around the proposed T03 may represent a bronze age ceremonial landscape. The report mentions a wedge tomb at AH04 and locates its nearest proposed turbine as T01. The report fails to show a dolmen (ITM coordinates X 591705 Y 844724) which is approx 280m north of the fort AH01 on the top of Saddle Hill. In the image below you can see AH01 (point D), this dolmen (point C) and larger fort AH03 (point E) all form a straight line.





To install a Turbine right beside an area of recognised archaeological significance and, as of yet unrecognised, potentially even more significance would be devastating.

4.The Visual and noise impact of T03. This turbine will be one of the closest to houses of all the proposed turbines. It will dominate the landscape of the nearest houses. The tranquillity and beauty of Shasmore will be destroyed by this Turbine T03. As the EIAR chapter 14 ARCHAEOLOGICAL, ARCHITECTURAL AND CULTURAL HERITAGE report states in 14.3.11.1 Proposed Wind Farm Site “T03 is located in a prominent position and is likely to be visible from all directions.”

5. The impact on wildlife of the proposed development would be significant. I know the saddle hill area very well, from farming the area in my youth and enjoying walking its unspoilt beauty to this day. On a walk of the area around T03 proposed site (April 3rd, 2026), I recorded the song of a skylark at the proposed location for T03. The skylark is an amber listed bird according to Birds of Conservation Concern in

Ireland 2020-2026. I cannot find a single reference to a skylark, nor the potential destruction of its habitat near T03 in the chapter 6 Ornithology report.

I am happy to provide this recording should that An Coimisiún Pleanála request it.

The Hen harriers, buzzards, marsh fritillary butterfly, and red squirrel that all call this place there home, deserve to have their habitat remain unspoiled. I find it abhorrent that the mitigation against hen harrier Turbine strike in chapter 6 table 6.1, are “.... designed to encourage breeding hen harrier away from turbine locations, thereby reducing the likelihood of collision during both foraging and display flights.”

I have paid €50 online as part of this observation.

Yours Sincerely

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