

Crumhach Wind Farm

Planning observation

To An Coimisiún Pleanála
64 Marlborough Street, Dublin 1, D01 V902

Case reference: PAX21.324561
Applicant: SSE Renewables (Ireland) Limited
Development: Crumhach Wind Farm, County Sligo

Observer details

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Purpose of this observation

The purpose of this observation is to identify shortcomings and inconsistencies in the Crumhach Wind Farm application submitted to An Coimisiún Pleanála. It addresses construction traffic and road safety, works affecting private land, proposed restrictions on existing turf-cutting rights, and the landscape, heritage and visitor setting of Cooper's Lodge.

The grounds draw on the applicant's own assessments and drawings, the supplied photographs, published visitor information and relevant planning decisions. The concern is the acceptability of the development at these locations, rather than wind energy in principle.

Permission should be refused for the layout as submitted for the reasons set out below. References are provided alongside the relevant sections and in section 4.

1 Road transport and construction effects

1.1 Turn 18 requires physical works beyond the carriageway

Drawing WCH-CVL-SK-0011-05 shows a delivery vehicle negotiating Location 18 on the L2702 beside the derelict church, using manual steering with a 74-metre blade. The drawing identifies nearby buildings, overhead cables and areas marked 155 m² and 305 m². These features demonstrate the constrained setting for the proposed manoeuvre. [4–5]

EIAR Chapter 15, Material Assets, section 15.1.9, p. 15-66 (Location 18), expressly identifies removal of a private wall and vegetation and preparation of a temporary run-over area for axle loads on private land east of the L2702. The corresponding route plan is Appendix 15-3, drawing WCH-CVL-SK-0011-05, Rev. 01, PDF p. 36. The manoeuvre depends on works beyond the carriageway, not simply the passage of a large vehicle. [4–5]

The application identifies the broad works, but the material cited here does not provide a sufficiently clear account of the precise extent of wall removal, how the works would be carried out and the final reinstatement at this bend. The swept-path drawing shows horizontal vehicle movement; it does not, by itself, establish construction methods, safe overhead clearance, ground strength or protection for adjacent property. The objection concerns the adequacy of the information, rather than an assertion that no works are described. [4–5]

1.2 Road users and night-time disturbance

Large, slow-moving deliveries occupying this bend create potential conflicts with residents, pedestrians, farm traffic and emergency access. The required wall removal and run-over works add to the disturbance at this already constrained location.

The Traffic Management Plan refers to 120 abnormal loads, 45 convoys of three vehicles and 45 delivery nights over about nine weeks. If each convoy carries three abnormal loads, that programme implies 135 loads. The relationship between these figures is unclear and weakens confidence in the stated frequency of disruption. [6]

Night delivery reduces conflict with daytime traffic but brings repeated turning, idling, braking, alarms and lighting close to homes. Advance notice can help residents prepare; it does not remove the disturbance. The assessment needs to address the conditions at this bend as well as traffic volumes across the wider route. [6]

The potential disturbance extends beyond turbine delivery nights. Chapter 4 permits occasional work outside the normal 07:00–19:00 Monday-to-Saturday period for concrete pours, favourable weather and large-component deliveries, with advance notification to the local authority. Residents may therefore experience extended working hours during other construction activities as well. The objection concerns the frequency, duration and location of that disturbance, rather than assuming continuous overnight working. [3, section 4.7.1]

1.3 Road strength and protection of property

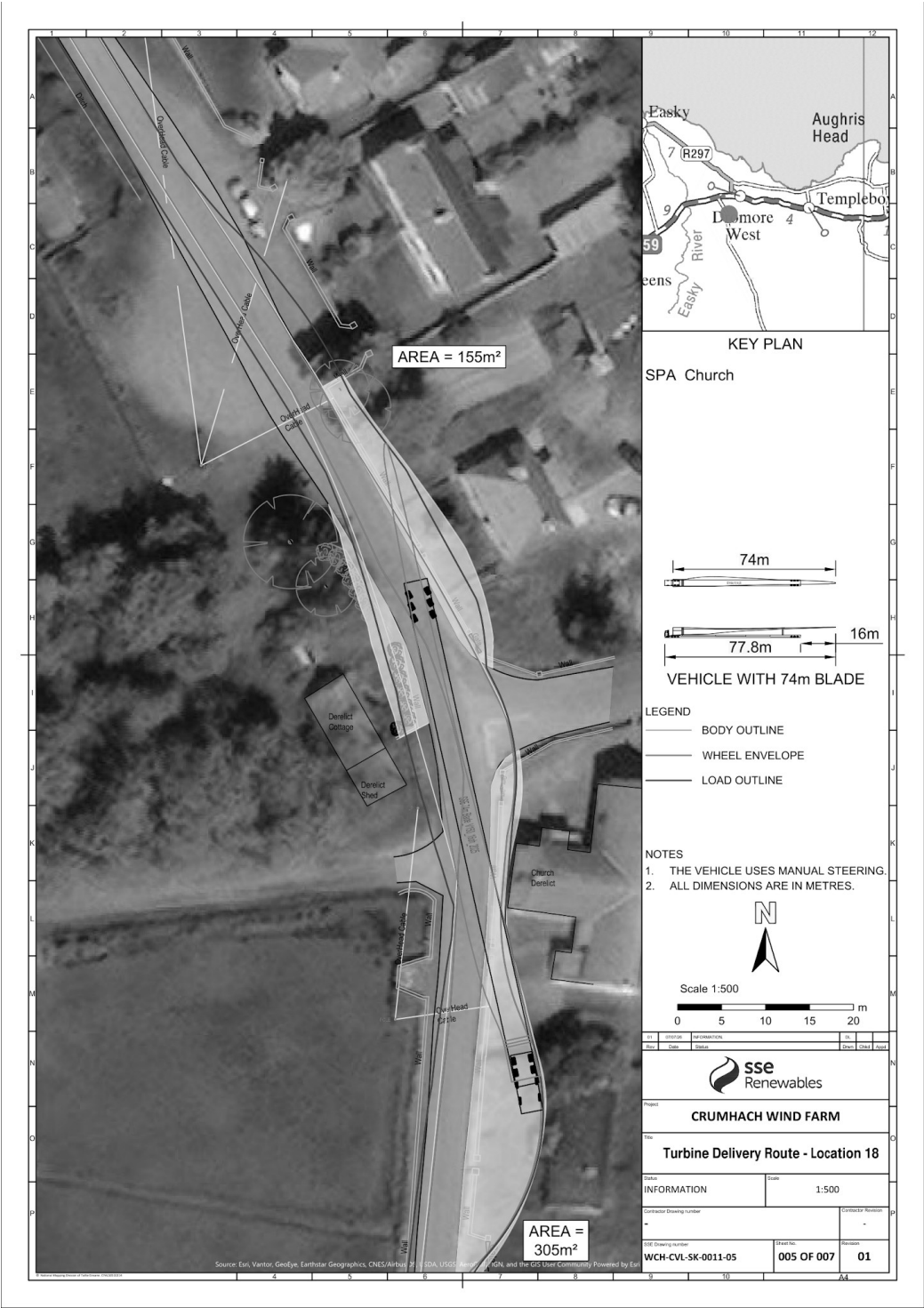
The proposed run-over area makes ground strength, road edges, culverts and drainage particularly relevant. A vehicle tracking line does not demonstrate that each supporting surface can safely carry the loads.

Pre- and post-construction condition surveys can identify damage, but they do not prevent it. The proximity of the church, roadside masonry and overhead services makes protection during the works and deliveries a substantive concern. [4–6]

The Stage 1 Road Safety Audit identifies site entrances A–E. Its stated scope does not clearly establish assessment of the particular Turn 18 manoeuvre and night-time conditions. The safety of the entrances and the safety of this bend are distinct issues. [7]

1.4 Turn 18 drawing supporting the concerns

Applicant’s drawing WCH-CVL-SK-0011-05, Rev. 01, 7 July 2026, sheet 005 of 007; Appendix 15-3, PDF page 36. [5]

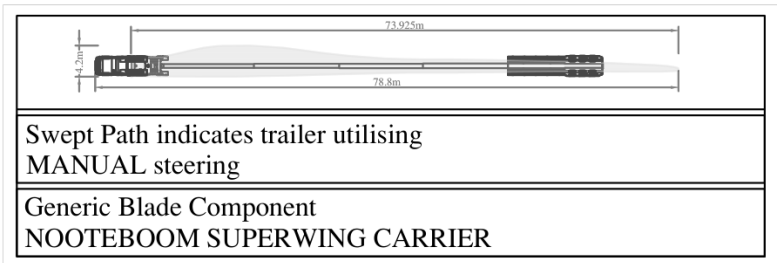


Reduced monochrome reproduction. Refer to the original for colour, dimensions and full detail; do not scale from this reproduction.

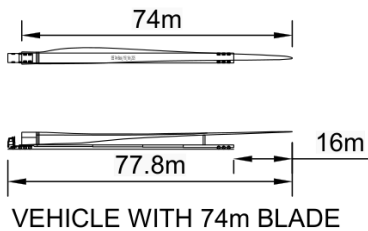
1.5 Vehicle dimensions and clearance at Turn 18

1.6 A one metre change in the modelled combination

Appendix 15-3 shows an overall vehicle/load length of 78.8 m at Location 13, Ballysadare bridge (PDF p. 30), but 77.8 m at Location 14, Abbeystown (p. 32), and Location 18, the church bend (p. 36). The earlier model uses a generic Nooteboom carrier and a 73.925 m blade; the later model specifies a 74 m blade. The one metre difference therefore concerns the overall combination, rather than a shorter blade. [5]



Location 13 — 78.8 m overall; drawing J2357-13, 28 February 2024, PDF p. 30.



Location 18 — 77.8 m overall; WCH-CVL-SK-0011-05, Rev. 01, 7 July 2026, PDF p. 36.

1.7 Manual steering and clearance beyond the plotted path

The Location 13 notes state that an additional buffer is required outside the swept path and that no margin or safety cordon is included. These notes belong to the earlier drawing set. At Turn 18, the drawing identifies walls, buildings and overhead cables, but gives no labelled minimum obstacle-clearance distances or quantified operating margin. Its 155 m² and 305 m² labels are areas, not clearances. [5]

- Delivery vehicles can be right or left hand vehicles therefore due to driver interpretation it is assumed that each vehicle will not follow the same path. Consequently, a buffer zone will be required outside of the Swept Path Analysis.
- This SPA is a means of providing evidence of minimum clearance of any vehicle as a footprint and there is no margin or safety cordon included.

Location 13 — extract from drawing notes, PDF p. 30. All extracts are monochrome reproductions; no dimensions have been altered. Refer to the original drawings for full context.

Turn 18 drawing note 1 expressly states that the vehicle uses manual steering. The plotted path therefore depends on the steering manoeuvre being achieved in practice. Allowance for variation in vehicle position, steering timing and the manoeuvre is material where the load passes walls, buildings and roadside obstacles. The drawing does not quantify a clearance buffer for these variations. Manual steering is not itself evidence that the turn is unsafe, but a plotted fit alone does not demonstrate a safe operating margin. [5, PDF p. 36]

The delivery vehicle configuration must be reconciled across the drawings, with minimum clearances and a justified safety buffer shown at Turn 18. The assessment should explain how manual steering will be controlled and how the operating area and safety cordon will be maintained during the manoeuvre. [5]

1.8 Concrete deliveries and local road use

The objection includes frequent ready-mix concrete deliveries and their effect on local road users. The figures below come from the applicant's traffic assessment. Chapter 4 shows a tapered foundation; its maximum width and depth alone do not establish the concrete volume. [3–4]

Table 15-9 forecasts 1,275 concrete deliveries over 17 pour days: 75 deliveries per day. Including the returning vehicles, this represents 150 one-way mixer movements per pour day, or 2,550 movements across the 17 days. The stated 12-hour delivery period implies an average 6.25 arrivals per hour, approximately one every ten minutes, plus departures. This is an average derived from the forecast, not an actual hourly schedule. [4, pp. 15-21–23]

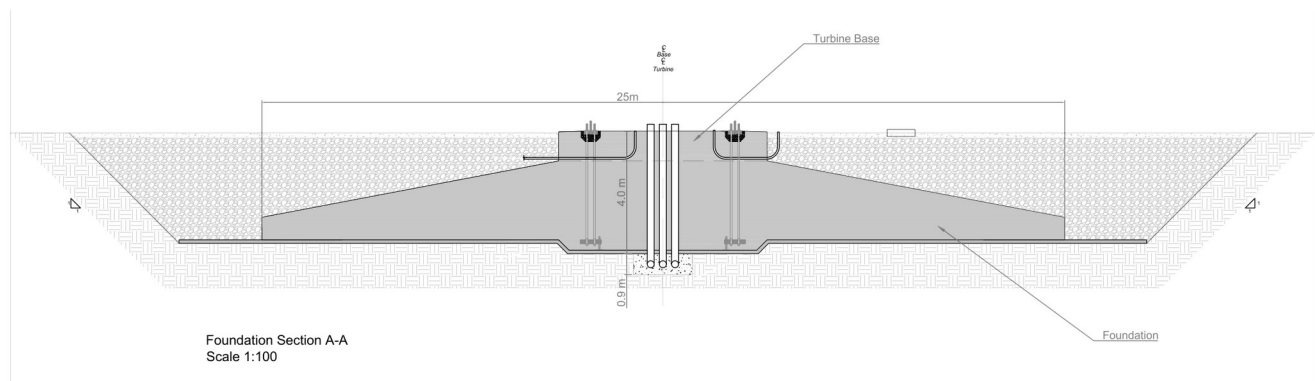
The wider burden extends beyond concrete. Table 15-8 forecasts 25,902 civils truck loads, including the 1,275 concrete loads and 22,764 rock, stone and road-construction loads. The concrete figure must not be added again to that total. These are project forecasts, not a claim that every load passes every local frontage. [4, pp. 15-21–23]

1.9 Large changes on local roads

Table 15-24 forecasts total daily traffic on the L6309 link to T6–T17 rising from 73 to 503 passenger car units (PCUs), an increase of 589.9%, on the 17 pour days. The L2702 link to T1–T5 rises from 84 to 514 PCUs, an increase of 512%. PCUs allow for different vehicle types; these totals are not counts of trucks and include other project traffic. [4, p. 15-38]

These increases are not confined to the 17 concrete-pour days. Table 15-26 forecasts 205 Phase 1 general-construction days, including grid works, with daily traffic rising from 73 to 519 PCUs on the L6309 link (+611.8%) and from 84 to 530 PCUs on the L2702 link (+531%). This is a sustained construction-phase effect. Treating the impact principally as a short series of concrete pours would understate the duration of the pressure on these roads. [4, pp. 15-39–40]

Chapter 15 acknowledges that additional traffic will be very noticeable to residents, but rates the local effect slight and not significant because traffic remains low relative to road capacity. Capacity alone does not establish acceptable conditions for walking, access to homes or vehicles meeting on narrow sections. The objection concerns both the intensity and sustained duration of heavy-vehicle activity, and the practical effects on people using these roads. [4, pp. 15-92–94]



Foundation section from EIAR Chapter 4, Figure 4-5, PDF page 15. Cropped monochrome reproduction showing the tapered profile. Maximum width and depth do not establish the concrete volume. Do not scale from this image. [3]

1.10 Foundation design and concrete traffic

The foundation assumptions are inconsistent across the EIAR. Chapter 4, section 4.8.2.3 (p. 4-88), says piled foundations are likely, with gravity foundations possible particularly at T4, T5 and T6. Chapter 8, section 8.6 (p. 8-36), instead expects gravity foundations at 12 turbines (T2 and T7–T17), with either option at the other five. The traffic assessment needs to demonstrate that its concrete allowance covers the foundation options assessed. [3 –4, 24]

The pile specifications also differ. Figure 4-6 shows 16 piles, each 18 m long and 1.2–1.6 m in diameter; Chapter 4, p. 4-88, describes a possible arrangement of up to 20 piles of 0.9 m diameter. For the largest piles in Figure 4-6, the cylindrical volume is $16 \times \pi \times 0.8^2 \times 18 = 579.1 \text{ m}^3$ per turbine, before the base above. These alternatives require a clear explanation of the quantities used in the traffic forecast. [3]

1.11 How the concrete lorry totals are calculated

This illustrative scenario assumes an 800 m³ base plus the largest piles shown in Figure 4-6 at each of the 17 turbines, with 8 m³ carried per lorry. The base volume is a rough allowance informed by the tapered drawing, not a fully dimensioned quantity calculation. The base volume and lorry capacity are assumptions; this is not a verified maximum or a prediction that all 17 turbines will require piles.

- 1. Pile concrete per turbine: $16 \times \pi \times (1.6 \div 2)^2 \times 18 = 579.1 \text{ m}^3$.
- 2. Base and piles per turbine: $800 + 579.1 = 1,379.1 \text{ m}^3$.
- 3. Loads per turbine: $1,379.1 \div 8 = 172.4 \rightarrow$ round up to 173 loads.
- 4. Loads for all 17 turbines: $173 \times 17 = 2,941$ loaded lorry arrivals.

Concrete lorry traffic	EIAR allowance	Calculated scenario
Loaded arrivals per turbine	75	173
Loaded arrivals for all 17	1,275	2,941
All 17 including return journeys	2,550	5,882

Extra loaded lorries: $2,941 - 1,275 = 1,666$ additional deliveries (+130.7%).

Including return journeys: $2,941 \times 2 = 5,882$ one-way movements, compared with $1,275 \times 2 = 2,550$ in the EIAR allowance. Difference: $5,882 - 2,550 = 3,332$ additional movements. No extra waste allowance is included.

Why the allowance needs explanation: at 8 m³ per load, their 75 loads provide 600 m³ per turbine. The largest drawn piles alone require 579.1 m³, leaving $600 - 579.1 =$ only 20.9 m³ for the base above. This does not reconcile with the illustrated substantial base. Either the assumed lorry capacity, the foundation option, or the delivery allowance needs to be explained and supported by quantities.

Piling and base pouring are separate operations, so the combined total cannot be divided across the 17 base-pour days to claim a daily peak. A reconciled foundation schedule, concrete quantities and delivery programme are needed to establish the traffic effects on local road users.

1.12 Reliability of the traffic baseline

1.13 Survey date and announced road closures

Chapter 15, section 15.1.3.1, identifies 10 March 2026 as the date of the local traffic surveys. The underlying sheets in Appendix 15-1 confirm that date for the N59/L2702 junction count and the automatic counts on the local access roads. The L2702 counter serving turbines T1–T5 recorded 36 northbound and 32 southbound vehicles, a total of 68 over that day. [4, pp. 15-16–18; 22, PDF pp. 7–18 and 20–21]

Uisce Éireann’s announcement dated 26 February 2026 states that water-main replacement works would begin in the coming days along sections of the L2702 and L63072/R297, between Lough Easkey Water Treatment Plant and Knockacullen. It states that sections of the route would require road closures, with the project expected to finish in the summer. The announced works period therefore overlaps the traffic survey date. [23]

My account is that the route was closed and through traffic avoided it. This is my local account, separate from the published notice. The notice establishes the planned works and closures, but does not establish which sections were closed, or the closure hours, on 10 March 2026.

1.14 Why this matters to the assessment

An accurate count of diverted traffic is not an accurate baseline for normal road use. A survey can count every passing vehicle correctly while missing traffic displaced by a closure. The assessment relies on these counts to describe existing conditions and calculate percentage increases; if closures affected a count, those conclusions may be distorted. The overlap between the announced works and the survey date therefore requires a clear explanation. Until the closure records, diversion arrangements and survey notes are reconciled, the affected counts have not been demonstrated to represent normal conditions.

The locations must also be distinguished. Table 15-3 reports 756 vehicles per day on the L2702 south of the N59 (Link 6), compared with 68 towards turbines T1–T5 (Link 8). These are different counting locations, not conflicting measurements at Turn 18. Neither figure, without a clear link to the bend and intervening junctions, establishes the normal traffic passing Turn 18. The construction percentage increases quoted in this observation remain the applicant’s calculations and depend on its adopted baseline. [4, pp. 15-17–18]

[22] Appendix 15-1, Traffic Count Data, survey sheets dated 10 March 2026. www.crumhachwfplanning.com/s/Appendix-15-1-Traffic-Count-Data-F-230841.pdf

[23] Uisce Éireann, “Network upgrade works to strengthen supply for Sligo customers”, 26 February 2026. www.water.ie/news/network-upgrade-works-strengthen-supply-sligo-customers

2 Turf cutting and turbary rights

2.1 Cutting rights and the open night

I attended the open night in 23rd July 2025 and raised the issue of turf-cutting rights. The effect on those rights was discussed only after I asked the question. My turf cutting will be affected, and I was not consulted beforehand about the proposed cessation of cutting. My understanding is that the other affected rights holders were not consulted either.

Answering a question at an open event is not a substitute for direct consultation with the people whose existing cutting rights would be affected. The concern is a restriction proposed for the project's lifetime without prior discussion with those rights holders about its extent and consequences. SSE's July 2025 newsletter advertised the events for 23 July in Dromore West. [25]

Appendix 6-4 proposes a 36-hectare management area for the project's lifetime and states in section 2.1.2: "No peat cutting will be permitted". This is evidence of an intended restriction lasting for the project's lifetime. It is not simply a short interruption during construction. [8]

2.2 Effect of the proposed restriction

The management plan does not, by its wording alone, establish agreement by affected rights holders to stop cutting. Where the claimed environmental benefit depends on cutting ceasing, the ability to deliver that measure is relevant to the reliability of the assessment.

The restriction has a direct household consequence: turf that can no longer be cut must be replaced by another source of heat. Does the applicant intend to supply me with free electricity sufficient to replace the heat that my turf would otherwise provide, or am I expected to meet that replacement cost myself? Electricity supplied to the national grid does not, by itself, replace my household's fuel supply. Proposed compensation or an alternative cutting plot is not evidence that an arrangement has been accepted. I'd like to add that compensation was discussed on the open night but not since.

2.3 Similar planning cases

Carrig, County Tipperary, ABP-318689-23: observers raised effects on their turf area and a lack of consultation. The inspector recorded proposed access arrangements, compensation or alternative banks, and distinguished planning permission from the right to carry out development. The comparison shows the relevance of practical arrangements with rights holders; it was not a ruling that every turbary objection requires refusal. [11]

Firlough, Mayo/Sligo, ABP-317560-23: the inspector recorded the developer's statement that it had consent from 97 turbary rights holders within the works area, while cutting would continue elsewhere. The report recommended permission. This provides a concrete comparison in which consent and the extent of continued cutting were expressly addressed. [12]

These cases show the importance of addressing affected turf-cutting rights and demonstrating how any proposed restriction would work in practice.

[11] Carrig Renewable Energy Ltd, Inspector's Report ABP-318689-23, pp. 45 and 57–58.
www.pleanala.ie/anbordpleanala/media/abp/cases/reports/318/r318689.pdf

[12] Firlough, Inspector's Report ABP-317560-23, section 9.1.33, pp. 54, 202 and 204.
www.pleanala.ie/anbordpleanala/media/abp/cases/reports/317/r317560.pdf

[25] SSE Renewables, Crumhach Wind Farm Public Consultation Newsletter, July 2025, p. 2: events on 23 and 24 July 2025.
www.sserenewables.com/media/hgphnl4v/100725-crumhach-wind-farm-public-consultation-newsletter.pdf

3 Cooper's Lodge and the scenic views

3.1 The scenes requiring visual assessment

The supplied photographs identify two scenes around Cooper's Lodge whose character would be affected by the proposed turbines. Table 13-9 lists 15 photomontage viewpoints but none is identified as Cooper's Lodge. Chapter 14 refers to a lodge photomontage without giving its figure or viewpoint number in that paragraph. The connection between that image and these scenes is therefore unclear. [1–2]



Scene 1 Supplied image identifying the scenic setting at issue. Capture position and height are unverified.

3.2 The lake view does not represent every scene

The application assesses Lough Easky, Farranmacfarrell and Crumhach, among other viewpoints. These are different locations from the scenes shown here. Screening by hills in a lake view cannot establish the effect in closer views around the lodge. [1]



Scene 2 Supplied image identifying another view around the lodge. No proposed turbines have been added.

3.3 The applicant's own findings support the objection

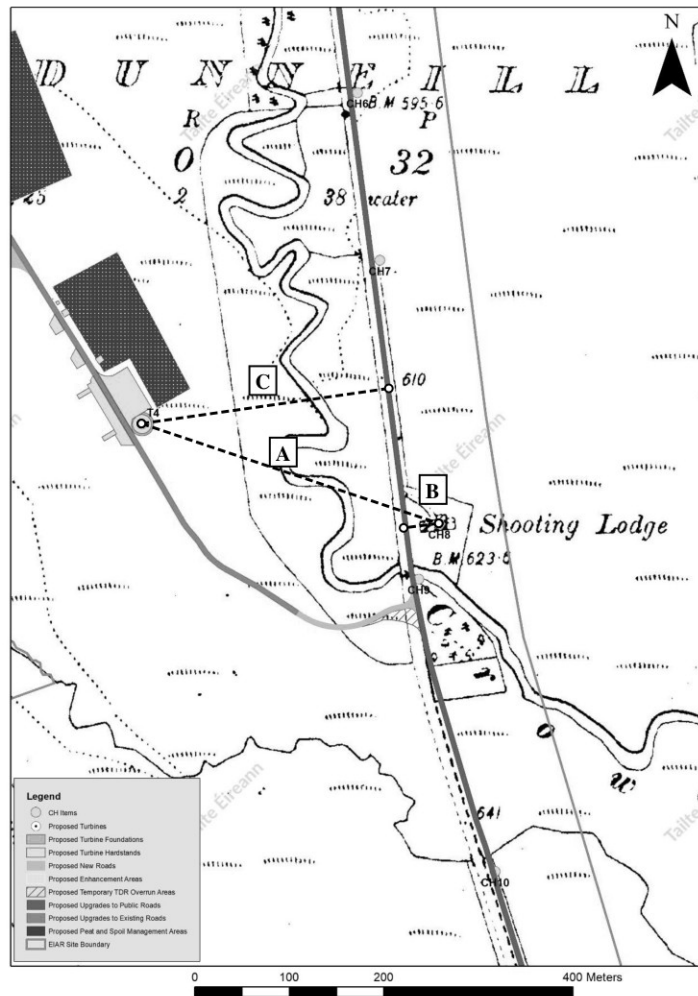
Section 13.7.3.2.4 predicts a substantial change and a significant visual effect at Cooper's Lodge, with turbines visible in several directions. Yet section 13.8 concludes that there will be no significant landscape or visual effects overall. That broad conclusion does not reconcile the significant effect expressly identified at the lodge. [1]

If the overall visual effect is said to be not significant, why is there no clearly identified photomontage demonstrating that conclusion for the affected scenes around the lodge shown here? Chapter 14 refers to a lodge photomontage, but its connection to these scenes and the Chapter 13 viewpoint list is unclear. A view in one direction cannot explain the effects of turbines on several sides of the lodge. The conclusion needs clear visual evidence covering those views. [1–2]

3.4 Turbine proximity to public roads

Road access is a separate concern alongside the visual effects. Construction traffic and works affecting the road past Cooper's Lodge could affect access and the visitor experience. The map below provides location and distance context; it does not show how the proposed turbines would appear in either supplied scene.

The applicant reports 332 m between lodge CH8 and T4. Section 5.8 of the 2006 Guidelines advises separation from national and regional roads and railways equal to full turbine height, or 176.6–180 m for this proposal. The December 2019 draft proposes height plus 10%, or 194.3–198 m. These figures cannot establish a breach here without the relevant road classification and surveyed measurements. The principal visual objection is the acknowledged significant effect and the unclear coverage of the views around the lodge. [2,9–10]



DISTANCES AT COOPERS LODGE

A Lodge CH8 to turbine T4
332 m reported by the applicant
Table 14-10, Chapter 14.

B Lodge CH8 marker to public-road line
Approximately 40 m
Indicative measurement from the figure.
This is not a surveyed wall-to-road-edge clearance.

C T4 marker to public-road line
Approximately 260 m
Indicative nearest separation on this figure; not a surveyed road-boundary distance.

How to read this map

Dashed lines and A-C labels were added for this observation. B and C use the printed scale bar (400 m) and are rounded to about 10 m. Historical mapping and line thickness limit precision.

The public road beside the lodge is distinct from the turbine access track beside T4 and the proposed connecting road south of the lodge.

These indicative distances provide context for the road and landscape setting; they do not establish a breach of road-separation guidance.

Source: applicant EIA/IA Chapter 14, Figure 14-18, printed page 14-71 (PDF page 75), final 7 August 2026. Historic OS background with proposed works. Grayscale reproduction; original legend uses colours. Use the original drawing for engineering detail.

3.5 Landscape policy and assessment conclusions

The significant effect identified at the lodge must be considered in the context of the scenic-route policy and designated landscape. The objection concerns the weight given to these specific effects in the overall assessment.

3.6 The overall conclusion does not resolve the lodge finding

There is an unresolved inconsistency between the overall conclusion in section 13.8 that there are no significant landscape or visual effects and the significant effect at Cooper's Lodge recorded in section 13.7.3.2.4 and repeated in section 13.9. The summary confirms that the lodge finding is substantive. The assessment needs to explain how that acknowledged local harm has been weighed in reaching its overall conclusion. [1]

Appendix 13-1 explains that viewpoint selection represents key views at different distances and directions. A clear link between the lodge photomontage mentioned in Chapter 14, the viewpoint list and the affected scenes is necessary to understand the visual evidence relied upon. [1–2,15]

3.7 Scenic designation and local character

The SR-58 assessment emphasises unobstructed distant views and movement along the route. Policy P-LCP-3, reproduced in section 13.4.1.1, also protects the distinctive visual character of scenic routes, including local roadside features. Keeping a distant view open does not establish that the nearer scene is unaffected. [1]

Table 13-4 places 15 of the 17 turbines within Sensitive Rural Landscape, yet section 13.4.4 assigns the site low overall landscape sensitivity. The applicant distinguishes wind-energy sensitivity from the designation and relies on existing land uses. The objection is that insufficient weight is given to the landscape's identified scenic qualities and limited capacity to absorb development. The different ratings are a matter of assessment judgment, not in themselves a factual contradiction. [1]

3.8 Appeal decisions recognising visual harm

Gougane Barra, ABP-315656-23: the seven-turbine proposal was refused in May 2024 because of its landscape and visual effects. Shehy More, PL04.243486: permission granted in December 2016 required turbine T12 and its access road to be omitted for visual and residential amenity. These decisions show that visual harm can justify refusal or exclusion of a turbine. They do not determine Crumhach; the objection here rests on the lodge-specific evidence above. [13–14]

[13] ABP-315656-23, Board Order, 13 May 2024, p. 3, Reasons and Considerations. www.pleanala.ie/en-ie/case/315656 (Order).

[14] PL04.243486, Board Order, 23 December 2016, condition 3, pp. 6–7. www.pleanala.ie/en-ie/case/243486 (Order).

[15] Appendix 13-1 LVIA Methodology, sections 1.6.1 and 1.6.6 (viewpoints), section 1.8.1 and Table 1-6 (visual receptor sensitivity). www.crumhachwfplanning.com (Volume 3 EIAR Appendices).

3.9 Tourism and recreational use

3.10 Visitor experience is not the same as continued access

Chapter 5 predicts no residual effect on visitor experiences, relying on continued access to the Sligo Way and general research on wind farms and tourism. Continued access does not preserve the quality of a scenic experience. The conclusion does not explain how the significant visual change at Cooper's Lodge has been accounted for. [1,16]

3.11 Local importance does not justify the visual harm

Chapter 13 describes the lodge as locally important, not a recorded national monument and relatively unknown except to locals. Those descriptions do not answer its finding of a significant, long-term visual effect. Neither local heritage status nor limited popularity explains why the change to this particular setting is acceptable. [1]

The applicant's own methodology distinguishes the sensitivity of viewers from their number. Appendix 13-1, section 1.8.1, assesses sensitivity by people's activities and their attention to the scenery; Table 1-6 includes viewers along scenic or tourist routes in the high-sensitivity category. A small audience does not, by itself, reduce the effect on each person experiencing the view. This is directly relevant to visitors who come to appreciate the lodge's landscape setting. [15]

The lodge has recognition beyond the local area. Jen on the Road recommended it in a French-language Sligo visitor guide on 21 January 2021, with a photograph and directions. Vio Vadrouille also recommends it in an Ox Mountains guide. This challenges the suggestion of largely local recognition, without establishing National Monument status or visitor numbers. [18–19]

3.12 Documented walking and scenic tourism nearby

The Sligo Champion reported on 31 May 2023 that Enniscrone Walking Club had begun its summer evening walks with the Lough Easkey Loop. Discover Ireland also promotes this loop, its connection with the Sligo Way and the surrounding area's attractive scenery and outdoor activities. This supports the area's established recreational and tourism value. The walking report concerns Lough Easkey, not a recorded visit to the lodge. [20–21]

Fáilte Ireland's 2024 Sligo destination plan emphasises natural beauty, walking, rural experiences and the Ox Mountains. This further supports giving proper weight to the scenic setting and its tourism value. [17]

[16] EIAR Chapter 5, Population and Human Health, section 5.10.3.1.5, p. 5-77. www.crumhachwfplanning.com (Volume 1).

[17] Fáilte Ireland, Sligo Destination and Experience Development Plan, April 2024, pp. 2–4 and 14. www.failteireland.ie/en/wild-atlantic-way/sligo-development-plan

[18] Jen on the Road, "10 châteaux & ruines à voir dans le comté de Sligo", 21 January 2021, section 6. <https://jenontheroad.voyage/chateaux-ruines-comte-sligo/>

[19] Vio Vadrouille, "Sligo : que faire, que voir dans les Ox Mountains ?", section "S'arrêter au Cooper's Lodge". <https://vio-vadrouille.com/sligo-ox-mountains/>

[20] Sligo Champion / Independent.ie, "Around the districts: Gurteen, Enniscrone-Kilglass and Skreen-Dromard", 31 May 2023, Enniscrone Walking Club. <https://www.independent.ie/regionals/sligo/localnotes/around-the-districts-gurteen-enniscrone-kilglass-and-skreen-dromard/a1421883924.html>

[21] Discover Ireland, "Lough Easkey Loop", content supplied by Sport Ireland. <https://www.discoverireland.ie/sligo/lough-easkey-loop> (accessed 25 September 2026).

4 Conclusion and supporting references

4.1 Grounds for refusal

Permission should be refused for the layout as submitted for the following reasons:

- Road transport: Turn 18 requires wall removal and a prepared run-over area, but the extent, execution and reinstatement of those works are insufficiently clear in the cited material. Repeated night deliveries, other out-of-hours work and substantial traffic increases over 205 Phase 1 construction days raise safety, access and disturbance concerns that road capacity alone does not answer. [3–7]
- Turf-cutting rights: my cutting will be affected and I was not consulted before raising the issue at the open night. The environmental management measure depends on cutting ceasing for the project’s lifetime, without demonstrated agreement with affected rights holders. Its practical delivery is a material concern. [8]
- Cooper’s Lodge: the acknowledged significant visual effect is not reconciled with the overall landscape and tourism conclusions. Unclear photomontage coverage, scenic-route sensitivity and documented visitor interest reinforce the objection. Local status and limited visitor numbers do not resolve the harm to the setting. [1–2,15–21]

Taken together, these location-specific concerns support refusal of the submitted layout. The comparison decisions illustrate relevant considerations; the grounds rely on the evidence for Crumhach itself.

4.2 Documents referred to

The references below identify material in the Crumhach application, case 324561, available at www.pleanala.ie/en-ie/case/324561 and www.crumhachwfplanning.com. PDF page numbers count from the first page, including covers.

[1] EIAR Chapter 13, Landscape and Visual, final 7 August 2026: sections 13.4.1.1–2, pp. 13–24–25 (policy); Table 13-4 and section 13.4.4, pp. 13–35–36 (sensitivity); Table 13-9, pp. 13–55–56 (viewpoints); section 13.7.3.2.2, pp. 13–72–73 (SR-58); section 13.7.3.2.4, pp. 13–78–79 (lodge); sections 13.8–13.9 (conclusions and summary).

[2] EIAR Chapter 14, Cultural Heritage: Table 14-10 and Figure 14-18 (CH8 location); section 14.3.4.9, p. 14–176 (reference to lodge photomontage); Table 14-20, p. 14–177 (setting effects). Appendix 14-1, Photographic Record.

[3] EIAR Chapter 4, Description of the Proposed Project, final 7 August 2026: section 4.3.2.1.4, p. 4–11, Figures 4-5 and 4-6 and section 4.8.2.3, p. 4–88 (foundation options); section 4.5.2 (haulage); section 4.7.1 (working hours). Also Site Notice, Application Form, Chapter 3, Planning Report and Non-Technical Summary.

[4] EIAR Chapter 15, Material Assets, final 7 August 2026: section 15.1.4.2 and Tables 15-8–9, pp. 15–21–23 (loads); Tables 15-24 and 15-26, pp. 15–38–40 (traffic increases and duration); section 15.1.9, p. 15–66 (Turn 18 works); section 15.1.15.2, pp. 15–92–94 (effects).

[5] Appendix 15-3, Autotrack Assessment Drawings: Location 13, J2357-13, 28 February 2024 (PDF p. 30); Locations 14 and 18, WCH-CVL-SK-0011-01 and -05, Rev. 01, 7 July 2026 (PDF pp. 32 and 36).

[6] Appendix 15-2, Traffic Management Plan, final August 2026: section 4, printed pages 15–16 (PDF pages 16–17).

[7] Appendix 15-4, Stage 1 Road Safety Audit, 260039RPT001_RSA1_Rev_1, 6 August 2026: sections 1.2, 1.4–1.5 and 2, and feedback form.

[8] Appendix 6-4, Biodiversity Management and Enhancement Plan: sections 1.2–1.4, 2.1.1, 2.1.2 and 2.1.4; printed pp. 2–5 and 8. Appendix 2-2, Community Engagement Report. The attendance, question and personal lack of consultation are the observer’s firsthand account; the position of other rights holders is identified as the observer’s understanding.

[9] Wind Energy Development Guidelines (2006), sections 3.9 (tourism), 5.8 (roads) and 6.3 (siting), printed pp. 15, 31 and 37–39. <https://assets.gov.ie/static/documents/wind-energy-development-guidelines-2006.pdf>

[10] Draft Revised Wind Energy Development Guidelines, December 2019, section 4.9.1, printed page 46. Draft wording is identified as such and is not presented here as enacted law. Available from gov.ie under that title.

[24] EIAR Chapter 8, Land, Soils and Geology, final 7 August 2026, section 8.6, p. 8–36: foundation options at the 17 proposed turbines.