

To: An Coimisiún Pleanála

Re: Proposed Crumhach Wind Farm – Submission and Objection

Planning Reference: PAX21.324561

Submitted by: Dromore West Recreational Amenity Committee

Date: 25/9/26

1. Introduction

We are writing on behalf of Dromore West Recreational Amenity Committee a small voluntary community organisation involved in the development of a new community sporting facility in the local area.

Our proposed development comprises a **60m x 40m artificial sports pitch, floodlighting, car parking and associated infrastructure**. Our planning application for this development is currently under consideration. The site is located just off the L2702.

We respectfully request that An Coimisiún Pleanála **refuse permission for the proposed Crumhach Wind Farm**, having regard in particular to the potential cumulative effects of the proposed development on the local road network, road safety, access, community amenity and the delivery and future use of our community facility.

Our submission is not an objection to renewable energy in principle.

We recognise the importance of renewable energy development.

Our objection concerns the particular circumstances of the proposed Crumhach development, its scale, its construction requirements and its potential interaction with another significant community development which is dependent upon the same local road network.

2. Our Community Development

Our organisation is undertaking the development of a significant community sporting facility.

Subject to planning permission, funding and the necessary project arrangements, construction is currently anticipated to late 2027, with works expected to be phased over approximately two to three years.

It is currently hoped that the artificial playing surface will be substantially in place towards mid to late 2028, with lights and finishing works following on in phased developments.

These dates are indicative rather than commitments, as the project remains subject to planning, funding, procurement and construction arrangements.

The development will require construction traffic, deliveries, plant, machinery, contractors and specialist suppliers to access the site through the local road network, including the L2702.

3. Scale and Nature of the Crumhach Proposal

The proposed Crumhach Wind Farm is a major infrastructure project comprising 17 turbines together with substantial associated civil, electrical, grid, drainage, access and other infrastructure.

The application documentation includes a Construction and Environmental Management Plan, Traffic Management Plan, traffic data, road safety material, surface-water management documentation and other construction-related documentation.

The scale and nature of the proposal means that construction will involve substantial movements of vehicles, materials, plant, machinery and workers.

The potential consequences for the local road network therefore require careful consideration.

4. The L2702 as a Shared Local Resource

The L2702 is particularly important to our community development.

Our proposed facility is dependent upon access to the local road network.

The Crumhach development will also require substantial construction activity and associated traffic movements in the local area.

There is therefore a foreseeable potential overlap between the two developments.

This is not simply a question of additional traffic.

The two construction programmes may require access at particular times, significant deliveries, construction plant, specialist vehicles and potentially temporary traffic-management arrangements.

The consequences of this interaction should be considered as a cumulative planning issue.

5. Cumulative Construction Traffic

The proposed wind farm may generate movements including:

- heavy goods vehicles;
- construction plant;
- contractor vehicles;
- workforce traffic;
- aggregate and concrete deliveries;
- specialist and abnormal loads;

- electrical and grid-related traffic;
- road construction and improvement activity; and
- traffic associated with reinstatement and landscaping

At the same time, our community development may require its own deliveries, contractors and specialist construction operations.

We are concerned that the cumulative effect could adversely affect the ability of our community project to receive materials and maintain reasonable access during its construction.

The issue is particularly important for a small voluntary organisation which does not have the same flexibility or resources as a major infrastructure developer.

6. Potential Impact on Construction Programme

Construction projects depend upon sequencing.

A delay to one delivery or stage of construction can potentially have consequences for subsequent works, contractor availability and project costs.

We do not assert that Crumhach construction will necessarily cause such delays.

Rather, our concern is that the potential for such interaction should be treated as a material cumulative effect when determining whether the proposed wind farm can be satisfactorily accommodated at this location.

If significant construction traffic, temporary restrictions, road works or access arrangements associated with Crumhach overlap with our project, the consequences may be disproportionate for a small community organisation.

7. Road Safety and Community Users

The proposed community facility is intended to serve children, young people, parents, sporting clubs, coaches, volunteers and families.

Once operational, the facility is likely to generate regular movements of community users on the local road network.

The potential interaction between these movements and substantial construction traffic associated with Crumhach requires careful consideration.

We are concerned that the cumulative use of the L2702 could result in conditions which are less suitable for vulnerable community road users.

The issue should be considered not only during the construction of our facility but also once the facility is operational.

8. Access to the Community Facility

Reasonable access will be essential both during the construction of our facility and following its completion.

Potential construction-related measures associated with Crumhach could include:

- road works;
- temporary traffic lights;
- stop/go arrangements;
- diversions;
- temporary restrictions;
- abnormal-load movements;
- delivery restrictions;
- temporary obstruction; and
- other traffic-management measures

Any such measures could potentially interact with the construction or operation of our facility.

We therefore consider that the applicant should have demonstrated clearly that the proposed development can operate without unacceptable cumulative consequences for legitimate development and community use of the L2702.

9. Dust, Mud and Construction Debris

Our proposed artificial playing surface will form a significant part of the community facility.

We are concerned about the potential for construction activity to generate dust, mud or debris which could affect the facility or its surrounding access routes.

The concern becomes particularly relevant if our facility becomes operational while Crumhach construction or associated works remain ongoing.

Dust and mud can create practical maintenance issues and can adversely affect the amenity and usability of a community sporting facility.

We therefore ask the Commission to consider whether the cumulative effects of construction activity have been adequately addressed.

10. Surface Water and Drainage

The proposed Crumhach development involves substantial construction and surface-water management measures.

Our proposed development will also require appropriate drainage infrastructure.

We are concerned about the potential for construction runoff, sediment, mud or other construction-related material to affect the local road network, surrounding lands or drainage arrangements.

The Commission should be satisfied that these matters can be adequately controlled before concluding that the proposed development is acceptable.

11. Construction Noise and Community Amenity

It is possible that our community facility could become operational while significant Crumhach construction, commissioning activity remains ongoing.

The users of our facility will include children, young people, sporting clubs, coaches, volunteers and families.

Construction machinery, HGV movements, reversing alarms and other construction activity could affect the amenity of the facility.

We recognise that some construction disturbance is an unavoidable feature of major infrastructure projects.

However, the issue before the Commission is whether the cumulative duration, intensity and location of that disturbance can be satisfactorily accommodated alongside the community facility.

12. Construction Beyond Turbine Erection

We consider it important that the cumulative assessment does not treat turbine erection as the end of the relevant construction period.

The proposed development involves associated electrical, grid, testing, commissioning, reinstatement and landscaping works.

These activities may continue to generate traffic, noise, dust and other impacts.

The relevant assessment should therefore consider the full period during which significant works associated with the development could affect the L2702 or the community facility.

13. Regional Construction Resources

Our community development will require access to contractors, haulage, materials and specialist suppliers.

A major infrastructure development such as Crumhach may potentially draw upon some of the same regional construction resources.

We are not asserting that the wind farm will prevent our organisation from obtaining contractors or materials.

However, the potential cumulative pressure should be recognised when considering the practical consequences of overlapping construction programmes.

Our organisation does not have the resources or purchasing power of a major commercial developer and has considerably less capacity to absorb prolonged disruption or unforeseen additional costs.

14. Adequacy of Mitigation

The existence of a Construction Environmental Management Plan and Traffic Management Plan does not, in itself, establish that all cumulative impacts will be satisfactorily resolved.

The relevant question is whether the measures proposed are sufficient in the particular circumstances of the local area and, importantly, in circumstances where another significant development may be taking place at the same time.

We ask the Commission to consider whether the application has adequately demonstrated:

- that the L2702 can safely accommodate the anticipated cumulative traffic;
- that reasonable access to our development can be maintained;
- that significant construction movements can be managed without unacceptable disruption;
- that vulnerable community road users can be adequately protected;
- that dust, mud and debris can be effectively controlled;
- that surface-water impacts can be adequately managed;
- that community amenity can be protected during overlapping periods of construction and operation; and
- that appropriate mitigation can be secured and enforced throughout the full construction, commissioning and reinstatement period

15. Responsibility for Mitigation

If the Commission considers that mitigation is capable of resolving these concerns, such mitigation should be clearly secured through conditions and remain the responsibility of the developer and its contractors.

Our small voluntary community organisation should not be placed in the position of having to monitor Crumhach construction activity, police compliance, document breaches or manage traffic associated with the wind farm.

The burden of demonstrating compliance with planning conditions and implementing construction mitigation should remain with the developer.

16. Cumulative Effects

We consider the following cumulative relationship to be material:

- The proposed Crumhach development is a major infrastructure project.
- Our community development may be constructed during an overlapping period.

- Both developments depend upon the local road network, including the L2702.
- Both will require construction deliveries, plant, contractors and specialist vehicles.
- Traffic management measures associated with Crumhach may interact with access required by our development.
- Our facility may become operational while later stages of Crumhach remain ongoing.
- Construction activity may therefore affect both the delivery and subsequent community use of the facility.
- The resulting cumulative effects may include traffic, road safety, access, dust, mud, noise, drainage and general community amenity impacts.

We consider that these matters warrant significant weight in determining the acceptability of the proposed development.

17. Proper Planning and Sustainable Development

Our concern is fundamentally a planning concern.

We are not asking the Commission to disregard the strategic importance of renewable energy.

Rather, we ask the Commission to determine whether this particular development, at this particular location and with its particular construction requirements, can be satisfactorily accommodated having regard to the local circumstances.

The strategic importance of renewable energy does not remove the requirement for site-specific assessment of traffic, environmental effects, road safety, access and community amenity.

18. Request for Refusal

Having regard to the matters outlined in this submission, we respectfully request that An Coimisiún Pleanála **refuse permission for the proposed Crumhach Wind Farm.**

In particular, we ask the Commission to consider whether the proposed development has adequately demonstrated that its cumulative interaction with other significant development using the L2702 can be satisfactorily managed without unacceptable effects on:

- the local road network;
- road safety;
- access to legitimate development;
- the delivery of our community sporting facility;
- the amenity of future users of that facility;
- local environmental conditions arising from construction activity;
- surface-water and drainage arrangements; and

- the wider community during periods of overlapping construction and subsequent commissioning/reinstatement activity.

19. In the Alternative

If, notwithstanding the concerns outlined above, the Commission is satisfied that the identified impacts are capable of being satisfactorily resolved, we respectfully request that any permission be subject to **robust, specific and enforceable conditions** addressing those matters.

Such conditions should include appropriate arrangements concerning:

- construction traffic;
- the L2702;
- road safety;
- access;
- abnormal loads;
- advance notification of significant road works and restrictions;
- dust and mud;
- road cleanliness;
- surface-water protection;
- construction noise;
- community amenity;
- construction liaison; and
- continuation of relevant mitigation through construction, commissioning, reinstatement and landscaping

Any such measures should remain the responsibility of the developer and its contractors and should not impose an ongoing monitoring or management obligation upon our voluntary community organisation.

20. Conclusion

We recognise the importance of renewable energy development and are not opposed to renewable energy as a principle.

Our objection relates to the particular circumstances of the proposed Crumhach Wind Farm and the potential cumulative effects arising from its construction and associated activities alongside our proposed community development.

The L2702 is an important local road and is relevant to both developments.

The potential overlap of construction programmes creates a legitimate concern regarding traffic, access, road safety, dust, mud, drainage, noise, community amenity and the ability of a small voluntary organisation to deliver and subsequently operate its community facility without avoidable disruption.

We respectfully request that the Commission give these cumulative effects full consideration.

In the absence of sufficient demonstration that these matters can be satisfactorily addressed, we respectfully request that permission be refused.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'K Hannon', positioned above a horizontal line.

Karl Hannon

Chairperson

on behalf of

Dromore West Recreational Amenity Committee

Dromore, Dromore West, Co Sligo

dromorewestrac@gmail.com