

Dromore West Village Enhancement Committee

c/o Geraldine McCloat
Dromore West,
Co. Sligo
Contact: Geraldine McCloat,
Email: gmccloat@gmail.com

Strategic Infrastructure Development Section
An Coimisiún Pleanála
64 Marlborough Street
Dublin 1, D01 V902

Date: 25th September 2026

Re: Case Ref. 324561 (PAX21.324561) – Crumhach Wind Farm, Co. Sligo. Application by SSE Renewables (Ireland) Ltd. for the removal of 23 no. existing turbines, the erection of 17 no. wind turbines and associated works in the townlands of Crowagh or Dunneill Mountain, Ballyglass, Tawnadremira, Doonbeakin, Dunowla, Kingsmountain, Ballygreighan Barr, Corhawnagh, Abbeytown, Knockaculleen, Rathgoonaun, Lecarrow and Dromore, Co. Sligo

A Chara,

This observation is made on behalf of the Dromore West Village Enhancement Committee under Section 37E of the Planning and Development Act 2000, as amended, and Article 217 of the Planning and Development Regulations 2001, as amended. The prescribed fee of €50 is enclosed. Please send all correspondence to the address above.

The Committee supports renewable energy and Ireland's transition to a lower-carbon economy. However, we are deeply concerned that the proposed Crumhach Wind Farm has not adequately assessed the combined impact of the development on Dromore West and its surrounding community.

Dromore West is the nearest village to the proposed wind farm. This small, close-knit rural community, situated on the N59 between the Ox Mountains and the Atlantic along the Wild Atlantic Way, will bear a substantial share of the project's impacts. The village is not simply a route to the development; it is where people live, children attend school, businesses operate and visitors stop.

The scale of the proposed disruption is considerable. For approximately two years, the village and surrounding roads will accommodate around 120 heavy goods vehicle movements each day, alongside abnormal-load convoys travelling at night. All abnormal loads and most construction traffic will pass through the village's central crossroads.

The route directly affects 14 business premises, including a veterinary clinic serving the wider West Sligo area, a post office, a chemist, food outlets, shops and other essential service providers. These businesses serve local residents as well as people travelling through the area. Schoolchildren, parents, school buses, local residents, farmers, walkers and visitors will all have to share these roads with construction traffic.

The impacts will not end when construction is complete. The project will permanently alter parts of the village streetscape, bring grid connection works along the N59 and leave the community living alongside turbines almost twice the height of the existing ones for the next 35 years.

The cumulative consequences for road safety, children travelling to school, local businesses, residents' daily lives, public amenity and the character of the village are substantial. These are not isolated or short-term inconveniences; they are interconnected impacts that will affect the community during construction and, in some cases, for decades afterwards.

We believe that a development of this scale must be assessed in the context of the community that will experience its effects. The Committee is not seeking to prevent renewable energy development. We are seeking a thorough and fair assessment of the impacts on Dromore West, appropriate safeguards for the people who live and work here, and meaningful measures to protect the village's future.

The following submission sets out our concerns; the deficiencies we have identified in the application and the further information and planning conditions we ask the Commission to consider. References are to the application documents published on the Commission's website. Supporting drawings, photographs and documents are included in Appendices A to H.

1. Decommissioning of the existing and proposed wind farms

- 1.1 The community of Dromore West has supported the existing Dunneill and Kingsmountain wind farms since they were first commissioned. We have lived alongside them for many years, and that support has not wavered. It is because of this long relationship that we are concerned about how the removal of the existing turbines, and in time the new ones, will affect our village.
- 1.2 The application includes a Decommissioning Plan (Appendix 4-6). However, Section 2.4.2.1 of that plan states that the removal of the 23 existing turbines forms part of the construction phase and "is not considered as part of this decommissioning plan", referring instead to the Construction and Environmental Management Plan (Appendix 4-5). Chapter 4 describes what this removal involves. The towers will be broken back into their original sections and taken off site. The existing foundations will be backfilled, using soil imported by HGV where there is not enough suitable material on site. The 15 existing hardstands that will not be reused will also be covered with imported soil (Chapter 4, Sections 4.3.1.1, 4.3.1.2 and 4.3.1.6.2). This means 23 towers, 23 nacelles and 69 blades, many of them abnormal loads, together with the HGVs bringing in soil, all leaving or arriving by road during the same period as the construction traffic described in Section 3 of this observation. The Committee cannot find anywhere in the application how many loads this will involve, which route they will take, whether they will pass through Dromore West, at what times they will travel, or where the components will go. Nor can we establish whether these movements are included in the traffic figures in Table 15-8 and the road and junction assessments in Chapter 15.
- 1.3 The Decommissioning Plan for the new wind farm raises the same concern for the future. Section 2.4.2.2 states that the new turbines will be removed in the same way they were delivered, in extended articulated trucks. That means a second round of abnormal loads through our village at the end of the wind farm's life, this time with larger components. Soil will again be imported by HGV (Section 2.4.2.3), rubble from demolishing the control buildings will be taken off site (Section 2.4.2.6), and waste will go to a facility about 21.3km north-east of the site (Section 3.3). Section 3.4 accepts that abnormal-load deliveries may take place outside normal working hours. Yet the plan gives no traffic figures. It simply states that decommissioning traffic will be less than construction traffic (Section 3.9.1) and that its effects will be "similar" but "to a lesser extent" (Table 7-1, MM4), and it defers the Traffic Management Plan until decommissioning (Section 3.8). The plan also refers to itself as "Appendix 4-8" in its own monitoring table (Table 8-1, MX1), a further example of the lack of care in the documentation.
- 1.4 **Dust.** Section 3.3 of the Decommissioning Plan accepts that decommissioning will generate dust from reinstating foundations, from traffic on site roads and from vehicles

travelling along the haul route, and that transporting decommissioning materials may generate dust in dry weather. The removal of the existing turbines, the importing of soil and the heavy vehicle movements during construction will do the same. The haul route passes through Dromore West, where homes, the school and local businesses sit close to the road. Dust settling on these properties is more than a passing nuisance. It dirties windows and the walls of houses. It coats solar panels and reduces the electricity they generate, a real cost to households that have invested in them. It obscures CCTV cameras that people rely on for security. It settles on children's outdoor play equipment, trampolines and garden furniture, and contaminates swimming pools, paddling pools and hot tubs. It soils washing on the line, cars, gardens and vegetable plots. The dust measures proposed are largely discretionary: dust suppression will be applied "if necessary", and roads will be watered "as deemed necessary by the Site Supervisor/Manager". There is no dust monitoring at homes along the haul route, no trigger level for action, no complaints procedure for residents, and no commitment to clean or make good property affected by dust from the works.

- 1.5 The Committee asks the Commission to require the applicant to quantify the heavy and abnormal loads involved in removing the existing 23 turbines, show their route and timing, and include them in the Chapter 15 traffic assessment, and to give an indicative number of loads for the end-of-life decommissioning of the new turbines. If permission is granted, the Committee asks that the protections set out in Section 11 apply equally to decommissioning traffic; that the future decommissioning Traffic Management Plan be prepared in consultation with the community; that a financial bond or other security be required to ensure the site is properly decommissioned and the public roads reinstated at the end of the wind farm's life; and that a dust management plan with enforceable monitoring, complaints and make-good measures be required for the construction, existing-turbine removal and decommissioning phases, as set out in conditions 11(r) and 11(s) below.

2. Turbine delivery route through Dromore West village

- 2.1 Section 4.5.3 of the EIAR (Chapter 4) and Section 15.1.10 (Chapter 15) describe works at three locations in the village. At Location 15 (N59 Right Turn at Dromore West), axle loads will pass over footpaths, and street furniture will be removed. At Location 16 (Dromore West), a private wall will be removed and "reinstated 2 metres from the edge of the existing carriageway". At Location 17 (Dromore West Turn South), hedgerow will be removed and an overrun area used. Section 15.1.4.2 states that 136 abnormal loads (blade transporters up to 83.9m long) will be delivered over approximately 45 nights across about 9 weeks, with all deliveries made at night.
- 2.2 **Location 15 in detail.** The swept-path drawing for Location 15 in Appendix 15-3 (SSE drawing WCH-CVL-SK-0011-02, sheet 002 of 007, reproduced at Appendix A) shows a transporter carrying a 74m blade making the turn at the junction of the R297 (the Easkey Road) and the N59 in the centre of the village. The drawing shows that, at this turn: the wheel envelope leaves the carriageway and crosses the kerbed footpath and paved area on the inside of the corner, so the transporter's wheels will run over the footpath itself; the load outline, where the blade overhangs, sweeps across the parking bays in front of a number of businesses on the north side of the N59; and on the south side the load outline crosses the kerb and footpath towards the boundary wall and gate. In other words, this abnormal-load movement uses the full width of the village street, footpaths and parking included, from building line to building line.
- 2.3 This has direct consequences for the village on each of the approximately 45 delivery nights. Every parked car must be cleared from the bays and roadside, including the cars of residents who park on the street overnight, and footpaths must be closed. Street furniture, signs and any other obstructions within the swept path must be removed, either for the whole delivery period or each night. Homes and businesses on both sides of the

street will have convoys, escort vehicles, marshals and lighting outside their doors in the middle of the night. None of this is described or assessed in the EIAR, which refers only to footpath overrun and the removal of street furniture.

- 2.4 The drawing itself also gives cause for concern. Its status is marked "INFORMATION" and its number identifies it as a sketch ("SK"), first issued on 7 July 2026, rather than a design drawing. Its notes state that "the vehicle uses manual steering", meaning that the rear of the transporter is steered by an operator, so whether the path shown is achieved depends on the operator on each night. The drawing does not show street lights, poles, signs, drainage gullies, utility covers, trees or other features within the swept path, which items will be removed, or how the footpath will be strengthened to carry axle loads and then reinstated. Finally, the drawing models a 74m blade on a 77.8m vehicle, while Section 15.1.4.2 refers to blade transporters up to 83.9m long, and the turbine model has not yet been chosen. If a longer blade or vehicle is used, the swept path through the village will be wider than the drawing shows.

- 2.5 **The Millennium Rock.** A substantial rock, unveiled in 2000 to mark the millennium, stands on the paved corner on the inside of this turn, immediately beside the path of the transporter. It is a well-known local landmark and a symbol of community pride. The monument was commissioned and erected by the local community of Dromore West and the Kilmacshalgan parish. It serves as a permanent, physical marker of the millennium milestone for the village of Dromore West. Moving it strips away the historical context of where the community originally gathered to welcome the year 2000.

It is not shown on the swept-path drawing, and the Committee could not find it mentioned anywhere in the EIAR. The Committee asks the Commission to require the applicant to confirm the position of the Millennium Rock in relation to the swept path; to protect it in place throughout the works; and only if moving it is unavoidable, to do so with the agreement of the community, using specialist contractors, and to reinstate it at the applicant's cost at a location agreed with the Committee. Its position is marked on the drawing at Appendix A, and photographs are attached at Appendix B. A photographic record should be made before any works begin. The Committee also asks, as further information, for detailed design drawings of Location 15 showing all existing features, everything to be removed, footpath strengthening and full reinstatement, and a swept path based on the largest blade and vehicle that could be used.

- 2.6 The EIAR describes these works as "temporary" and "minor". Setting back a boundary wall by 2 metres permanently changes the village streetscape and is not a temporary work. Allowing heavy axle loads over public footpaths creates a clear risk of damage and a hazard for pedestrians afterwards. The EIAR contains no drawings showing how these footpaths, kerbs, street furniture and the wall will be reinstated, or to what standard. Nor does it address telephone and telecommunications cables, public lighting, signage, drainage or verges within the village that may be affected.
- 2.7 The swept-path analysis is described throughout as "preliminary". The EIAR also states that "there are sections on the route where the vertical alignment may require specialist transport vehicles. These sections will be further considered by the appointed transport company following turbine procurement process" (Section 4.5.3). The Commission is therefore asked to consent to a route whose feasibility through our village has not been fully confirmed, and which may require further, as-yet-unassessed works.
- 2.8 The Stage 1 Road Safety Audit (Appendix 15-4) examined only the five site access junctions (A to E), on one daylight visit on 21 April 2026. It did not audit the accommodation works in Dromore West village (Locations 15–17), the N59/L2702 junction, or the L2702 between the village and the site. These are the locations where members of the public are most exposed to construction traffic and abnormal loads. The Committee submits that the road safety assessment is incomplete.

- 2.9 No night-time noise assessment has been made of abnormal-load convoys, escort vehicles and associated works passing homes in the village over 45 nights. Chapter 12 (Section 12.6) accepts that noise from road junction works along the delivery route "may at times exceed the guideline levels", yet this was assessed only qualitatively. The only community communication proposed is "letter drops and posters" (Appendix 15-2, Traffic Management Plan).
- 2.10 **Positive proposal:** since the wall at Location 16 is to be set back 2 metres in any event, the Committee asks the Commission to require the applicant to explore, with the landowner, Sligo County Council and the Committee, whether the resulting space can be used for a permanent public benefit such as a footpath or public-realm improvement, rather than simply rebuilding the wall.

3. Scale of construction traffic on the L2702 and through the village

- 3.1 The Non-Technical Summary and Chapter 3 state that "the majority of material for site roads, turbine hardstands, etc. will be sourced from the proposed onsite borrow pits", avoiding "a large temporary increase in construction traffic and heavy loads". Section 15.1.2.3 repeats that the majority of crushed stone will come from the borrow pits. However, Table 15-8 assesses 25,902 truck deliveries to the site, including 22,764 loads of "Rock / stone / road construction", on the public road network. These positions appear inconsistent. The Commission should require the applicant to clarify how much material will be imported by road, and whichever figure is relied on should be limited by condition.
- 3.2 On the traffic chapter's own figures (Tables 15-11, 15-12 and 15-17), general construction will generate about 288 HGV passenger car units (PCUs) per day, equal to about 120 HGV movements per day. This will continue for about 410 working days, rising to about 150 HGV movements per day on the 17 concrete-pour days. Grid construction traffic comes on top of that. On the L2702 south of the N59 (Link 6, Table 15-20), HGV traffic will increase from 229 to 589 PCUs per day, roughly 2.5 times the existing level. Expressing this as a "+47.7%" increase in total traffic (Table 15-26) understates the effect on the people who live along this road.
- 3.3 Table 15-32 shows that the N59 east of the L2702 will go from 94% of its link capacity to 103% during construction. West of the L2702, it will go from 105% to 114%. Although the EIAR's own figures show the N59 at Dromore West operating over capacity, it describes the effects as "slight". That conclusion is not supported by the evidence.
- 3.4 The traffic counts for the local links were taken on a single day, Tuesday 10 March 2026 (Section 15.1.3.1). No pedestrian, cyclist or school-related counts were carried out in the village. A single-day count is not a sound basis for assessing a construction period of about two years. That date also fell within Uisce Éireann's water mains replacement works on the L2702 and L63072/R297 (see paragraph 5.4), which began in late February 2026 and involved road closures and diversions on those roads. Road closures and diversions were in place on the count date, so the baseline traffic figures for the L2702 do not represent normal conditions.
- 3.5 The assessment of the N59/L2702 junction (Section 15.1.6.1, Table 15-33) does not account for the grid connection. Construction of the 110kV cable along about 23km of the N59 is proposed to run for about 230 working days under "Stop & Go" traffic control (Table 15-34; Appendix 15-5, TII Design Report). The EIAR has not modelled the combined effect of Stop & Go control on the N59 and construction traffic turning at the village junction at the same time.
- 3.6 The EIAR contradicts itself on road closures. Section 15.1.9 states that "it is not anticipated that any sections of the local road network will be closed". Yet Table 15-34 proposes closing the L6309 for 66 days for the grid cable. The L6309 is also the main construction access road and serves local residents.

- 3.7 Pre- and post-construction road condition surveys are proposed only "where required by the local authority" (Appendix 15-2). Given the volume of HGVs and abnormal loads, the Committee submits that such surveys, together with a bond for reinstatement, should be mandatory.

4. School traffic, Joyce's Cross and vulnerable road users

- 4.1 Dromore West Central National School (Roll No. 19688W, Eircode F26 VW50) is located approximately 100 metres up a lane off the L2702, at Location 18 on the turbine delivery route. The school is reached only by this lane from the L2702 with no other access road. This lane joins the L2702 at Location 18, the exact point where accommodation works for the abnormal loads are proposed. The school has approximately 100 pupils. Despite this, the school is referred to in the application only once, in a telecommunications consultee response (Enet, Chapter 2 scoping responses). It is omitted from the Education baseline in Section 5.3.8.1 of Chapter 5, which lists only St. Mary's National School, Owenbeg School and Coláiste Iascaigh. It is not identified as a sensitive location in Chapter 15, and the Road Safety Audit did not examine the L2702 or the school lane junction. The EIAR therefore contains no assessment of the effect of the construction traffic, or of the works at Location 18, on children travelling to and from the school.
- 4.2 The Committee asks that no construction HGVs use the L2702 or pass through the village at school drop-off and collection times. We also ask for school-zone safety measures, including signage, speed control and traffic marshals at the school lane junction at Location 18 and at Joyce's Cross, to be agreed with the Board of Management, Bus Éireann school transport and Sligo County Council before construction starts, and that the works to form and remove the overrun areas at Location 18 be carried out during school holidays.
- 4.3 Section 5.3.8.3 of Chapter 5 states that "there are no designated walking trails within the Site". This is contradicted in the same section, and in Section 15.1.14.1, which confirm that 7.2km of the Sligo Way passes through the site, including 3.3km on the L2702 and 1.6km on the L6309. Section 15.1.11 confirms these are single-lane roads with passing places, and no speed limit signs were observed on the L2702. Walkers, cyclists, horse riders and the customers of two well-established local businesses on these roads would share them with the construction traffic described above. The L2702 is also designated Scenic Route SR-58 (Chapter 13, Section 13.7.3.2.2). A Sligo Way diversion and a walker safety plan should be required.
- 4.4 **School traffic on the L2702.** Every school morning at about 8am, the school bus travels up the L2702 collecting children, then comes back down the L2702 and turns into the school lane at Location 18. It makes the same journey in the afternoon at about 3pm. Many parents drive their children to school along the same road, and children cycle to school on it. The L2702 is a single carriageway with significant drains on both sides. There is no footpath, hard shoulder or verge where a cyclist can safely move aside, or where a car or bus meeting a lorry can pull in. The EIAR's own figures (Table 15-20, Link 6) show HGV traffic on the L2702 south of the N59 rising from 229 to 589 passenger car units a day during construction, which is from about 95 to about 245 HGV movements a day. Construction hours begin at 07:00, and Section 15.1.6.1 allows for up to 8 HGVs in and 8 out in a single peak hour. On every school day for about two years, the school bus, parents' cars and children on bicycles will therefore be meeting construction HGVs on a single-lane road where neither vehicle can move aside, and where lorries or the bus may have to reverse to passing places with children on the road. The EIAR contains no count or assessment of school bus, parent, pedestrian or cyclist movements on this road.
- 4.5 **Location 18 works at the school lane junction.** The swept-path drawing for Location 18 (Appendix 15-3, SSE drawing WCH-CVL-SK-0011-05, sheet 005 of 007, reproduced at Appendix C, with photographs of the junction at Appendix D) shows the junction of the school lane with the L2702. It shows the transporter's wheel envelope and load outline

passing directly across the mouth of the school lane, and two overrun areas, of 155m² and 305m², on the school side of the road, with a further overrun strip on the opposite side. These areas appear to extend over the roadside verges, walls and drains, and the drawing shows trees within the swept path and overhead cables crossing the road. In practice, this means temporary hardstanding laid over the roadside drains, sections of wall and trees removed, and the entrance to the school lane reshaped, at the one junction that every pupil, parent and school bus must use. Although the abnormal loads themselves are to travel at night, the overrun areas will have to be built, maintained and removed, and may remain in place, while the school is in session, and the general construction HGVs will pass this junction throughout the school day. Like the drawing for Location 15, this is an "INFORMATION" sketch noting that the vehicle uses manual steering. It gives no information on how the drains will be kept open, how the walls, verges and trees will be reinstated, or how the junction will be kept safe for school traffic while the works are in place. The EIAR does not identify that this junction serves a school.

- 4.6 **The N59/L2702 crossroads.** All construction traffic, and every abnormal load, will turn at the N59/L2702 crossroads or Joyce's Cross as it is known locally in the village. This is also where children and parents wait for the school bus, pupils cross the N59 and cyclists turn. Long and articulated vehicles swing wide when turning, and at Location 17 (Dromore West Turn South) the abnormal loads will need hedgerow removal and an overrun area to make the turn. The only assessment of this junction in the EIAR is a capacity test (Table 15-33), which measures queues and delays for vehicles. It says nothing about the safety of pedestrians, cyclists or people waiting at the junction, and, as noted at 2.8, this junction was excluded from the Road Safety Audit.
- 4.7 **Visibility at the crossroads.** Visibility to the east and west along the N59 is poor for drivers pulling out from the L2702 and the L63072. The roadside verges are cut by the Council only once a year, in late August or September, so for most of the year, including the spring and early summer, sightlines are further reduced by growth. A fully laden HGV pulling out slowly onto the N59, where traffic travels at up to 100 km/h, is at particular risk. The EIAR assesses visibility splays only for the five site access junctions (Section 15.1.11), not for this crossroads, even though every construction vehicle will use it.
- 4.8 **Accident history at the crossroads.** Joyce's Cross as it is known locally has a long and serious accident record. At a meeting of Sligo County Council in September 2009, Councillor Michael Clarke called for improvements at the junction, describing it as particularly dangerous and stating that six people had been killed there over the years. He proposed a dedicated right-turn lane for traffic approaching from the Ballina direction. Other councillors supported the motion, and the Council's Senior Executive Engineer said the junction was being examined and could be considered under the Low Cost Accident Scheme (reported in the Irish Independent, "Improvements sought at dangerous Joyce's Cross junction", <https://www.independent.ie/irish-news/improvements-sought-at-dangerous-joyces-cross-junction/a/148207159.html>; a copy is attached at Appendix E). Seventeen years later, no right-turn lane has been provided, and no improvements have been made. The junction remains exactly as it was when the Council acknowledged it was dangerous. There have also been many minor collisions since, and the walls of the bridge on both sides of the N59 at the crossroads have been struck and rebuilt on a number of occasions (photographs at Appendix F). It is into this junction, unimproved despite its record, that the applicant proposes to add up to 245 HGV movements a day and 136 abnormal loads, alongside the school bus, parents and children already using it. The Committee could not find any review of the collision history of this junction in the EIAR. The Committee also asks whether the structural condition of the bridge has been assessed for abnormal loads. Its walls have been repeatedly damaged and rebuilt, and the Committee could not find any assessment of the bridge's capacity to carry turbine components weighing many tonnes.

- 4.9 The Committee asks the Commission to require, as further information: a review of the collision history of Joyce's Cross using Road Safety Authority and Garda data; a visibility splay assessment of Joyce's Cross to TII standards; a structural assessment of the bridge at Joyce's Cross for the proposed abnormal loads; a school traffic management plan prepared with the school's Board of Management, Bus Éireann school transport and Sligo County Council; a Road Safety Audit covering Joyce's Cross, the school lane junction at Location 18, the school route and school-time conditions; and detailed design drawings for Location 18 showing how the drains, walls, verges and trees will be protected and reinstated. If permission is granted, the conditions at 11(b), (c), (l), (m), (n), (u) and (v) below should be attached.

5. Public water supply

- 5.1 Section 9.3.14.1 of Chapter 9 states that "the Easky Lough water treatment plant is located immediately to the north of the Proposed Wind Farm 110kV substation location". It also states that "the underground water mains from Easky Lough runs along the L6309 and L2702 local roads which is also the route of the Proposed Grid Connection Route underground cable". These are the same roads that will carry the construction HGVs and abnormal loads. We understand that the Lough Easkey scheme supplies Easkey, Dromore West, Enniscrone, Skreen and surrounding areas, so any damage to the mains or interruption to the supply would affect a far wider area than the site itself.
- 5.2 The application is inconsistent on this infrastructure. Chapter 9 refers to a water treatment plant; Section 15.3.3.1.3 of Chapter 15 refers to the "Easky Wastewater Treatment Plant". Chapters 5 and 9 record Uisce Éireann's abstraction point as 600m to the south of the development, while Chapter 15 states 0.6km to the north. Chapter 15 also refers to a group water scheme abstraction point "within the Proposed Wind Farm".
- 5.3 Chapter 15 concludes that the project "has been designed to avoid any underground water mains", so "there is no potential to give rise to impacts on water and wastewater services". This cannot be right when the cable trench, the heavy construction traffic and the water main share the same narrow local roads. The Construction and Environmental Management Plan (Appendix 4-5, measure MM90) itself expects that "in the event that water mains are encountered the water supply will be turned off by the utility". Detailed crossing information has been deferred to the separate grid connection application.
- 5.4 **Recent water mains replacement on the same roads.** In 2026, Uisce Éireann replaced over 3,259 metres of old and damaged water mains between the Lough Easkey Water Treatment Plant and Knockacullen, along the L2702 and the L63072/R297, as part of its National Leakage Reduction Programme. The works, carried out by Farrans Construction, began in late February 2026 and were completed in late June 2026. They included new service connections from the main to customers' property boundaries along the route and required a road closure on the L2702 and the L63072/R297 (Uisce Éireann project page, <https://www.water.ie/projects/local-projects/lough-easkey-water-treatment-plant-knockacullen-water-mains-replacement>; copy at Appendix G). For months, residents, the school, local businesses and farmers endured closures, diversions and delays on exactly the roads that the applicant now proposes to use as its main construction haul route. Having only just come through that disruption, the community now faces a further two years of heavy construction traffic, abnormal loads and grid cable works on the same roads.
- 5.5 **Protecting a new public investment.** The new water mains and service connections now lie beneath the L2702 and the L63072, the roads that will carry about 245 HGV movements a day, 136 abnormal loads and the overrun areas at Location 18, and, along the L2702, the grid connection cable trench. These mains were replaced, at public expense, precisely because the old pipes were leaking and bursting. The EIAR states that the project has been designed to avoid underground water mains, but it does not appear to take account of the new mains, their depth, or the loads they were designed to

carry. The Committee asks that the applicant be required to locate and survey the new mains and service connections before any works begin; to demonstrate that the construction traffic, abnormal loads, overrun areas and cable trench will not damage them; and to repair any damage at its own cost without loss of supply to customers. The Committee also asks the Commission to confirm whether the Uisce Éireann works were considered in the EIAR's assessment of cumulative effects, and notes that the traffic counts relied on in Chapter 15 were taken while those works were under way (see paragraph 3.4).

- 5.6 Section 5.1.3 of Chapter 5 records that Uisce Éireann advised the applicant to submit a diversion enquiry and obtain a Confirmation of Feasibility letter from its Diversions Department in advance of any planning application. The Committee has not been able to find this letter in the application documents. We ask the Commission to confirm whether it was obtained and, if not, to require it as further information.
- 5.7 The Committee also asks the Commission to require, before any decision is made: a water-main protection plan agreed with Uisce Éireann, covering the mains and service connections replaced in 2026 as well as the older mains, with axle-load limits and protective measures along the L2702, L63072 and L6309; a contingency plan for alternative supply; and a commitment to give the community advance notice of any planned interruption.

6. Visual impact on the village

- 6.1 The proposed turbines would be up to 180m in tip height, almost twice the height of the existing turbines (75–100m, Chapter 13, Section 13.7.3.2.2).
- 6.2 For Viewpoint VP08 in the village, Appendix 13-2 rates the significance of effect as "Moderate", while Chapter 13, Section 13.7.3.2.5, rates the effect on Dromore West as "Slight". The same Appendix records that all 17 turbines would be visible from VP08, but describes them as "partially visible". The viewpoint is also labelled as Scenic Route SR-20 in one place and SR-7 in another. These inconsistencies undermine confidence in the conclusion for the village.
- 6.3 Only one viewpoint has been taken in Dromore West, which Chapter 13 identifies as the only village in the study area with a place in the settlement hierarchy. The Committee requests additional photomontages from the school, church, community centre, the N59 approaches and the L2702 leaving the village.

7. Residential amenity – shadow flicker and noise

- 7.1 Table 5-10 and Section 5.9.1 of Chapter 5 predict that 21 properties would exceed the 30-minutes-per-day shadow flicker threshold, of which 17 occupied dwellings require mitigation, and that the 30-hours-per-year threshold would be exceeded at two properties. Four properties are excluded from mitigation because they are "derelict". These houses may be restored and lived in during the 35-year operating life. The nearest dwelling is 728m from a turbine, which only just meets the setback of four times the 180m tip height (720m).
- 7.2 The Draft Revised Wind Energy Development Guidelines (2019) recommend conditions ensuring that no existing dwelling or other affected property will experience shadow flicker. Section 5.2.3.2 of Chapter 5 accepts that the proposed turbines could be brought in line with the Draft Guidelines through stricter implementation of the proposed mitigation. Since the applicant itself accepts that this is achievable, the Committee asks that a zero shadow flicker condition be attached.
- 7.3 Background noise was measured only in summer (June to September 2024), and only during two grid-outage periods (Section 12.4.3.2). The equipment at one monitoring location failed, and data from another was discarded because of a watercourse. The

DoEHLG 2006 Guidelines allow a daytime lower limit of 35–40 dB(A) in low-noise environments; the assessment adopts 40 dB(A), the least protective end of that range, for what is a very quiet rural area. The final turbine model has not been chosen; the Nordex N149 is used only as a candidate. The EIAR accepts that amplitude modulation "cannot be predicted" (Section 12.4.1.4) but offers only a community liaison officer as the response. There are 105 noise-sensitive receptors within 2.5km and 17 within 1km.

8. Community consultation, communication and community benefit

- 8.1 Section 2.8 of Chapter 2 records two public consultation events, on 23 and 24 July 2025, together with newsletters and a virtual consultation room. The Committee does not consider this adequate for a project of this scale, whose construction traffic passes through our village. Chapter 5 treats Ballysadare, 28km away, as the location of the main services and gives little consideration to Dromore West, even though Chapter 13 recognises it as a Service Village.
- 8.2 The community should not have to rely on second-hand information when major works are taking place on its doorstep. A formal communication structure should be in place before any works begin and should continue through decommissioning of the existing turbines, construction, abnormal-load deliveries, road and grid works, commissioning, and major maintenance during the operating life. This should include a named, locally based community liaison officer, and regular meetings with the Committee and local residents.
- 8.3 The Community Benefit Fund is proposed at €2/MWh (Chapter 4, Section 4.9.3) and is framed around the RESS Community Benefit Rulebook. That rulebook applies to projects successful in RESS auctions. If the electricity is sold another way, for example through a corporate power purchase agreement, there is no assurance that the fund will be provided at that level. Based on the applicant's stated annual output (enough for 74,460 households at 4.2 MWh each), the fund would be worth about €625,000 a year. The Committee asks that the fund be secured by planning condition, whatever route to market is used.
- 8.4 Dromore West will carry the construction impacts of this project and remain its nearest village for its whole operating life. The fund should explicitly include Dromore West, with near-neighbour payments and community representation on the fund committee. Eligible projects should include village enhancement and public-realm works identified locally, such as footpaths, lighting, landscaping, seating, community facilities, EV charging, and tourism and community safety measures. The Committee is willing to work constructively with the applicant and Sligo County Council to identify and agree these priorities.

9. Local businesses, tourism, amenity and turf cutting

- 9.1 **Local businesses on the route.** James Foy Auto Recovery, on the L2702 between Locations 17 and 18, and Liam Flynn Farm Supplies, right beside Location 18 on the L2702, serve a steady flow of customers: tractors, trucks, buses, cars and vans pulling in, turning and pulling out. These vehicles will share the road with about 245 construction HGV movements a day on the L2702 (Table 15-20) and with the abnormal loads. The EIAR does not identify these businesses, assess the conflict between their customer traffic and construction traffic at their entrances, or consider the effect of night-time deliveries, road closures and Stop & Go controls on their trade. The Committee asks that entrances to local businesses be kept clear and safe at all times, that construction vehicles do not park or queue across them, and that businesses be given advance notice of disruption.
- 9.2 **Lough Easkey and Coopers Lodge.** Section 5.4.2.1.1 of Chapter 5 recognises the Lough Easkey Loop trail around the lough, approximately 2km south of the nearest turbine. Lough Easkey and Coopers Lodge are local areas of scenic and recreational value, attracting visitors because of their natural landscapes and peaceful surroundings.

- 9.2 **Lough Easkey and Coopers Lodge.** Section 5.4.2.1.1 of Chapter 5 recognises the Lough Easkey Loop trail around the lough, approximately 2km south of the nearest turbine. Lough Easkey and Coopers Lodge are local areas of scenic and recreational value, attracting visitors because of their natural landscapes and peaceful surroundings. People travel to these areas along the L2702, the same narrow local road that the construction traffic will use, to enjoy the scenery, walking and other outdoor activities. Many of these visitors are unfamiliar with the roads. The EIAR does not assess how construction traffic, road closures and the grid cable works will affect safe access to Lough Easkey and Coopers Lodge. The Committee asks that access be maintained throughout, with advance signage and information for visitors.
- 9.3 **Turf cutting.** Section 5.3.7 of Chapter 5 records peat and turf cutting as one of the land uses within the site. Local people cut and save turf on Crowagh bog. During the cutting, footing and drawing-home season, roughly April to September, tractors and trailers use the same local roads and tracks as the construction traffic. The EIAR does not identify these turbary users or say how their access to the bogs will be protected during construction. The Committee asks that turbary rights holders be identified and consulted, that their access be maintained, and that works on shared roads and tracks be scheduled to avoid the main turf-drawing periods where possible.
- 9.4 **Funeral Home.** Our local funeral home operates on the N59 on the Sligo side of Dromore West, just before the village centre. This is where local families come at the most difficult time of their lives. Funerals, removals and reposals take place here during the day and into the evening, with hearses and funeral cars arriving and leaving, and mourners parking along the road and crossing the N59 on foot. The approach to the village at this point is protected by traffic calming measures: 50km/h gateway signs on both sides of the road, central traffic islands with keep-left bollards and hatched road markings, and street lighting (photographs at Appendix H). These are the measures that slow traffic entering the village and allow people to cross the road safely.
- 9.5 The EIAR's own figures show that the N59 east of the L2702, which includes this stretch, will go from 94% to 103% of its capacity during construction (Table 15-32). Construction HGVs will therefore pass the funeral home throughout the working day until 19:00, and abnormal-load convoys will pass it at night on about 45 nights. The application does not say whether any of the traffic islands, bollards, signs or lighting columns on this stretch will have to be removed or taken down to let construction vehicles or abnormal loads through, or how they would be reinstated. Heavy lorries or convoys passing during a funeral or while a family is gathered at a reposal would be distressing and disrespectful, and heavier traffic creates a real risk to mourners crossing the road in the evening. The Committee asks that the applicant be required to confirm whether any traffic calming, signs or street lighting here will be affected; that none be removed without temporary safety measures in its place, and that all be reinstated as soon as the works allow; that the street lighting be kept working throughout; and that the applicant agree a protocol with the funeral director so that construction traffic and convoys are paused or held back during funerals and removals.

10. Other matters

- 10.1 **Project splitting:** the 41.6km grid connection to Srananagh is assessed in the EIAR but will be the subject of a separate future application under Section 182A (Non-Technical Summary). The wind farm depends on this connection for most of its export capacity. The Committee submits that the effects of the whole project should be decided together, so that the community is not faced with a permitted wind farm and a grid connection whose effects are settled later.

10.3 Quality of the documentation: the application contains repeated errors. The L6309 is referred to as the "L6039" (Chapter 5 and Appendix 15-4), the village is called "Dunmore West" (Appendix 15-5) and the project "Crumnach" (Appendix 15-4). Section 5.3.6.2 of Chapter 5 compares local employment with "County Galway", which suggests text carried over from another project. Section 5.3.3 gives the population density of Dromore ED as 4.8 persons per km², although 576 persons over 12km² is about 48 per km². Chapter 5 gives the number of derelict properties within the shadow flicker study area as five in one place and four in another. The Decommissioning Plan (Appendix 4-6, Section 2.2) gives 4.6km of new access tracks and 29.1ha of forestry felling, while Chapter 4 gives 5.1km and 29.3ha. Chapter 4 gives the length of the grid connection along the N59 as 26.2km, while Chapter 15 gives about 23km. The number of new and existing entrances in Chapter 5 differs from the public notices, and the consent letter from Sligo County Council for the delivery route lands is undated. Taken together with the inconsistencies set out above, these errors indicate that the EIAR has not been prepared with the rigour needed for the Commission to rely on its conclusions about our village.

11. Conditions requested if permission is granted

Without prejudice to the above, if the Commission decides to grant permission, the Committee asks that the following conditions be attached:

- (a) A limit on the number of HGV loads of imported stone and aggregate, consistent with the EIAR's stated reliance on onsite borrow pits.
- (b) No construction HGVs through Dromore West village or on the L2702 during school drop-off and collection times, or on Sundays and public holidays. Construction HGV movements limited to Monday–Friday 07:00–19:00 and Saturday 07:00–13:00.
- (c) Stage 2 and Stage 3 Road Safety Audits that include the accommodation works in Dromore West and at the school lane (Locations 15–18), Joyce's Cross and the L2702, submitted to and agreed with the planning authority before development begins.
- (d) Mandatory pre- and post-construction condition surveys of the N59 and R297 within the village, the L2702 and the L6309, including structural surveys of properties adjoining the delivery route (offered to owners), with a cash deposit or bond to secure reinstatement to at least the pre-development standard.
- (e) Detailed drawings and a reinstatement specification for all footpaths, kerbs, walls, street furniture, lighting, signage, drainage, verges and utility cables affected in the village, to be agreed in advance with the planning authority and the Committee, with the village left in at least as good a condition as before the works. The space created at Location 16 to be considered for a permanent footpath or public-realm improvement, in agreement with the landowner.
- (f) A water-main protection plan agreed with Uisce Éireann before development begins, covering the mains and service connections replaced by Uisce Éireann in 2026 along the L2702 and L63072/R297, with a pre-construction survey of their location and condition, any damage repaired at the applicant's cost without loss of supply, advance notice to the community and alternative supply arrangements during any planned interruption.
- (g) A locally based community liaison officer, with a published 24-hour contact number and a complaints log reported to the planning authority; a community liaison group including the Committee, meeting regularly from before commencement until commissioning; and at least 14 days' notice to all households in the village of each abnormal-load delivery night and any road closure.
- (h) A Sligo Way diversion and walker safety plan agreed with Sligo County Council and Sport Ireland before development begins.

- (i) Zero shadow flicker at any dwelling, including any currently derelict dwelling that is restored, enforced by automatic turbine shutdown systems, in line with the Draft Revised Wind Energy Development Guidelines (2019).
- (j) Noise limits at all dwellings, with a daytime lower limit of 35 dB(A); independent post-commissioning compliance monitoring, with the results published; and a specific, enforceable amplitude modulation condition requiring investigation and mitigation, including shutdown, where amplitude modulation is found.
- (k) A Community Benefit Fund of not less than €2/MWh for the operating life of the wind farm, whatever route to market is used. The fund area should explicitly include Dromore West, with near-neighbour payments and community representation on the fund committee.
- (l) Trained traffic marshals at Joyce's Cross (the N59/L2702/L63072 crossroads) and at the school lane junction at Location 18 during school opening and closing times on construction days and during all abnormal-load movements, together with temporary warning signage and any temporary speed limit agreed with Sligo County Council and TII.
- (m) A visibility splay assessment of Joyce's Cross to TII standards, and applicant-funded maintenance of verges and roadside vegetation to keep the required sightlines open throughout construction, agreed with Sligo County Council and carried out in compliance with the Wildlife Acts.
- (n) A school traffic management plan agreed with the school's Board of Management, Bus Éireann school transport and Sligo County Council before development begins, covering HGV timing, bus stops, pedestrian and cyclist routes, and communication with parents.
- (o) An access plan for local businesses on the route, including James Foy Auto Recovery and Liam Flynn Farm Supplies, keeping entrances clear and safe, with advance notice of deliveries, closures and Stop & Go controls.
- (p) Identification of, and consultation with, turbary rights holders, with access to turf banks maintained throughout construction and works on shared roads and tracks scheduled to avoid the main turf-drawing periods where possible.
- (q) Maintained access and advance notice for Lough Easkey, Coopers Lodge and other local amenity and tourism businesses, including notice of every abnormal-load delivery night.
- (r) A decommissioning Traffic Management Plan, prepared in consultation with the community and agreed with Sligo County Council, for both the removal of the existing 23 turbines and the end-of-life decommissioning of the new turbines, together with a financial bond or other security, index-linked, to ensure full decommissioning of the site and reinstatement of the public roads.
- (s) A dust management plan covering construction, the removal of the existing turbines and decommissioning, including: dust monitoring at sensitive locations along the haul route in Dromore West, including the school; mandatory wheel washing, sheeting of loads and regular sweeping of the public road through the village; a complaints procedure with a prompt response; and a commitment that the applicant will clean, or pay for the cleaning of, windows, solar panels, CCTV cameras, children's play equipment, pools and other property affected by dust from the works.
- (t) Protection in place of the Millennium Rock at Location 15 throughout the works, with a pre-works photographic record; if moving it is unavoidable, relocation only with the agreement of the Committee, by specialist contractors, and reinstatement at the applicant's cost at a location agreed with the Committee.
- (u) Works to form, maintain and remove the overrun areas at Location 18 to be carried out during school holidays where possible; the roadside drains at Location 18 to be kept open and functioning throughout, using culverts sized and agreed with Sligo County Council;

and the junction of the school lane, including walls, verges, drains and trees, to be reinstated to at least its existing condition in consultation with the school's Board of Management and the Committee.

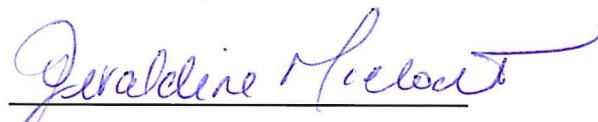
- (v) A structural assessment of the bridge at Joyce's Cross for the proposed abnormal loads, together with any strengthening or protective works it identifies, to be completed and agreed with Sligo County Council before any abnormal loads use the route, and a pre- and post-construction condition survey of the bridge and its walls, with any damage repaired at the applicant's cost.
- (w) A protocol, agreed with local business before construction begins, under which construction traffic and abnormal-load convoys are paused or held back during funerals and removals at the funeral home on the N59; and a requirement that the traffic calming measures, signs and street lighting on the N59 approaches to Dromore West be retained, or, if their temporary removal is unavoidable, replaced by temporary safety measures and reinstated as soon as the works allow, with street lighting kept working throughout.

12. Oral hearing

The Committee requests that the Commission hold an oral hearing on this application, given the number of households affected and the inconsistencies in the EIAR identified above.

The Committee recognises the national importance of renewable energy and wishes to see this project, if permitted, leave a positive and lasting legacy for the community that hosts it. We thank the Commission for considering this observation.

Is mise le meas,



Geraldine McCloat
on behalf of the Dromore West Village Enhancement Committee

13. Appendices

Appendix A: Swept-path drawing for Location 15 (N59 / R297 junction), with the position of the Millennium Rock marked

Appendix B: Photographs of the Millennium Rock

Appendix C: Swept-path drawing for Location 18 (school lane junction on the L2702)

Appendix D: Photographs of the school lane junction and the L2702

Appendix E: Irish Independent report on Joyce's Cross (September 2009)

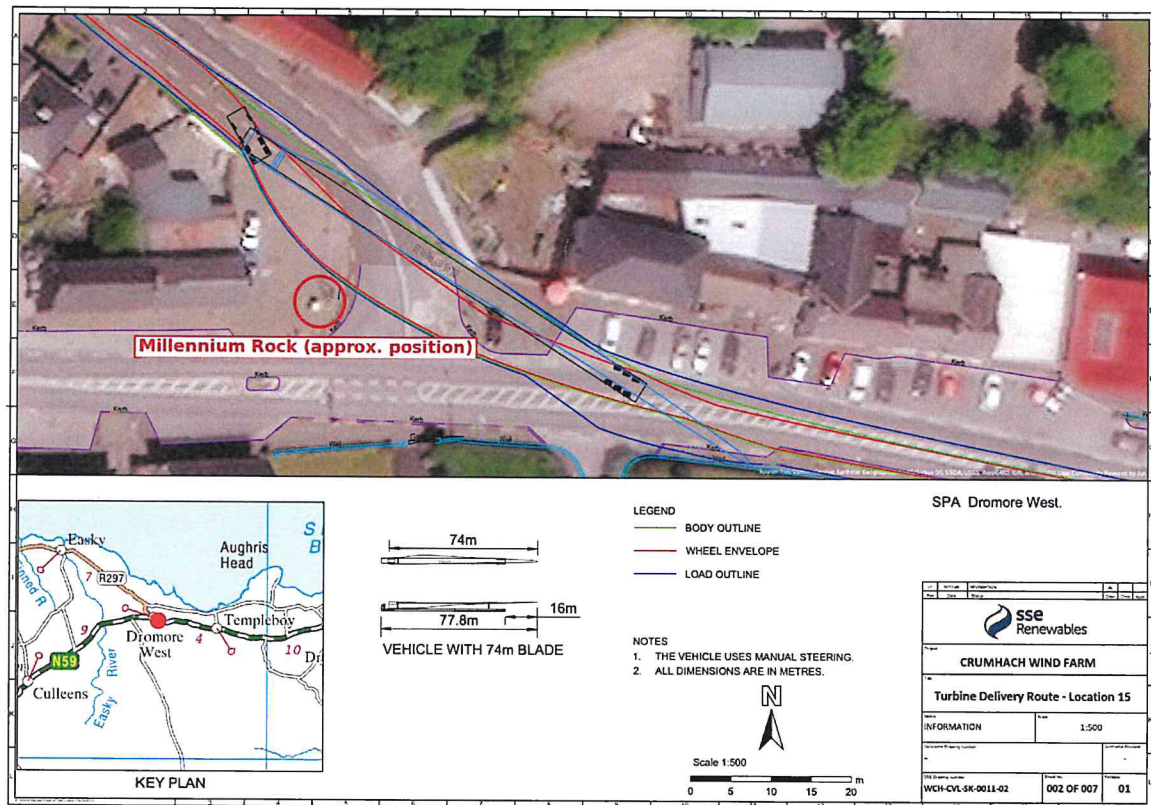
Appendix F: Photographs of Joyce's Cross and the bridge walls

Appendix G: Uisce Éireann project notice, Lough Easkey Water Treatment Plant to Knockacullen Water Mains Replacement

Appendix H: Photographs of the N59 approach to Dromore West at the Sean Sweeney Funeral Home

Appendix A: Swept-path drawing for Location 15 (N59 / R297 junction), with the position of the Millennium Rock marked

Referred to at paragraphs 2.2 to 2.5.



Drawing A1: SSE drawing WCH-CVL-SK-0011-02, sheet 002 of 007 (Turbine Delivery Route – Location 15), from Appendix 15-3 of the EIAR. The approximate position of the Millennium Rock has been circled in red by the Committee. Measured against the drawing's scale bar, the transporter's load outline passes within about 3 to 4 metres of the rock.

Appendix B: Photographs of the Millennium Rock

Referred to at paragraph 2.5.



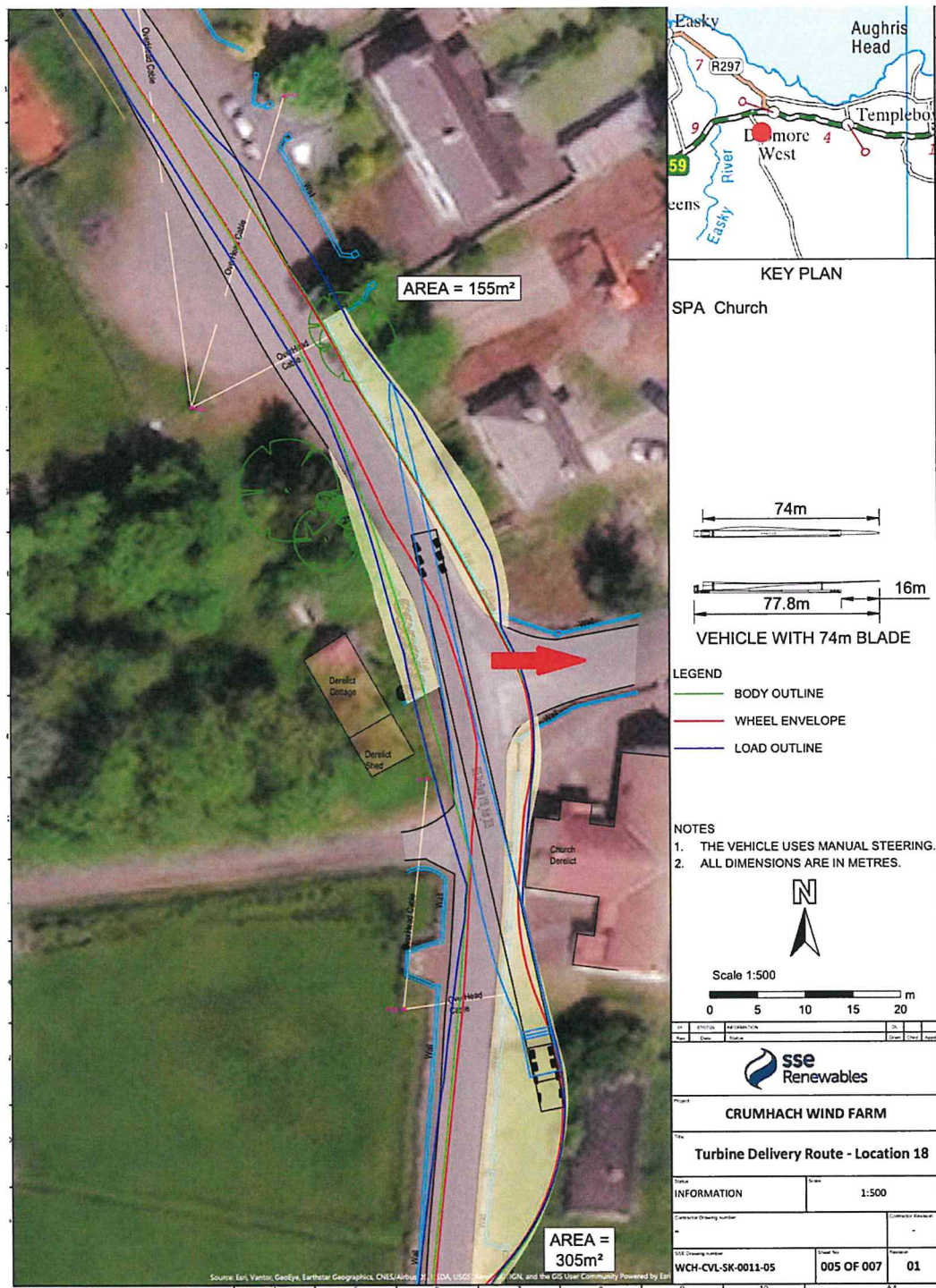
Photograph B1: The Millennium Rock on the paved corner at the junction of the N59 and the R297 (the Easkey Road), on the inside of the turn at Location 15. Source: Google Street View.



Photograph B2: The approach to the junction along the N59, with the Millennium Rock circled. The blade transporters will turn across this corner. Source: Google Street View.

Appendix C: Swept-path drawing for Location 18 (school lane junction on the L2702)

Referred to at paragraph 4.5.



Drawing C1: SSE drawing WCH-CVL-SK-0011-05, sheet 005 of 007 (Turbine Delivery Route – Location 18), from Appendix 15-3 of the EIAR. The red arrow, added by the Committee, marks the lane to Dromore West Central National School, approximately 100 metres from the L2702.

Appendix D: Photographs of the school lane junction and the L2702

Referred to at paragraphs 4.4 and 4.5.



Photograph D1: The junction of the school lane with the L2702 at Location 18, showing the narrow carriageway and roadside walls. Source: Google Street View, August 2024.



Photograph D2: The school lane leading from the L2702 towards Dromore West Central National School, beside the derelict church. Source: Google Street View, August 2024.

Appendix E: Irish Independent report on Joyce's Cross (September 2009)

Referred to at paragraph 4.8.

Please click the article "Improvements sought at dangerous Joyce's Cross junction",
<https://www.independent.ie/irish-news/improvements-sought-at-dangerous-joyces-cross-junction/a/148207159.html>

Appendix F: Photographs of Joyce's Cross and the bridge walls

Referred to at paragraphs 4.6 to 4.8.



Photograph F1: Joyce's Cross viewed from the L63072, looking across the N59 towards the L2702, with damage to the bridge wall circled. Source: Google Street View, September 2009.

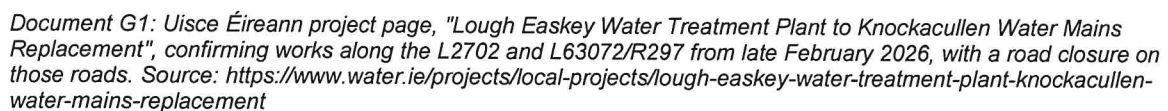


Photograph F2: The approach to Joyce's Cross on the L63072, with damage to the bridge wall circled from August 2024. Source: Google Street View.



Photograph F3: The bridge wall beside the N59 at Joyce's Cross, with damage again in 2018 circled. Source: Google Street View, August 2018.

Referred to at paragraphs 3.4, 5.4 and 5.5.



Appendix H: Photographs of the N59 approach to Dromore West at the Sean Sweeney Funeral Home

Referred to at paragraphs 9.4 and 9.5.



Photograph H1: The N59 approach to Sean Sweeney's Funeral Home. The view is leaving the village and heading towards Sligo. It is showing the central traffic island and bollards, street lighting and roadside parking. Source: Google Street View, August 2024.



Photograph H2: The N59 entering Dromore West from the Sligo side of the village, The image shows Sean Sweeney Funeral Home on the left, also showing the 50km/h gateway signs on both sides of the road, the central traffic island with keep-left bollards, hatched road markings and street lighting. Source: Google Street View.