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Strategic Infrastructure Development Section
An Coimisiún Pleanála
64 Marlborough Street
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Date: 28/9/2026

Re: Case Ref. 324561 (PAX21.324561) – Crumhach Wind Farm, Co. Sligo – SSE Renewables (Ireland) Ltd.

A Chara,

I make this observation under Section 37E of the Planning and Development Act 2000, as amended. The prescribed fee of €50 is paid online. Please send all correspondence to the address above.

My family own / hold the turbary rights to a turf bank at Crowagh, Co. Sligo (GPS 54.201909, - 8.867948; ITM E 543370, N 828458), which my family and I have cut and saved for over 50 years. The bog lies immediately west of the wind farm site boundary, beside the public road that the application proposes to upgrade. Measured from the turbine coordinates in Table 4-1 of the EIAR, it is about 600 metres from proposed turbine T2 and about 640 metres from T6, with T4 about 1.0km and T7 about 1.3km away. Its position is marked on the applicant's own layout drawing at Appendix A. Chapter 5 of the EIAR (Section 5.3.7) records turf cutting as an established land use in the area, but the application does not identify individual turbary users, and I have not been contacted by the applicant about my bog. I ask the Commission to take account of the following.

1. Access during the turf-cutting season

- 1.1 Turf is cut, spread, turned, footed, and drawn home predominately between April and September, and the work depends on dry spells that cannot be planned weeks in advance. Furthermore this Turf is sometimes stored on the bog in bags or stacks and may be drawn home anytime during the year. Access to the bog is by the public road on the western edge of the site, with tractors and trailers, a turf-cutting machine and cars. Chapter 4 states that sections of the L2702 and L6309 local roads will be widened and resurfaced as part of the project, and the road beside my bog is shown as a public road to be upgraded (Appendix A). The same roads will carry the construction traffic for about two years, including about 245 HGV movements a day on the L2702 (Table 15-20), and Table 15-34 proposes closing the L6309 for 66 days to lay the grid connection cable.
- 1.2 If the road is closed, blocked by works or congested with HGVs during a dry spell, the turf cannot be saved or brought home, and a full year's fuel for my household can be lost. Drawing home turf means slow-moving tractors and loaded trailers sharing a narrow road with construction HGVs. The road upgrade could also remove or damage the entrance to the bog, or leave a new road edge, verge or drain between the road and the bank that tractors cannot cross.
- 1.3 I ask that access to my bog be maintained at all times throughout construction; that no road closure or major works take place on the access road during the main turf-cutting and drawing-home season without my agreement; that I receive at least four weeks'

written notice of any works on the access road; that the entrance to the bog be retained and, where works affect it, reinstated to a standard suitable for tractors and loaded trailers; and that the applicant be required to identify and consult all turbary rights holders before the Construction and Traffic Management Plans are finalised.

2. Shadow flicker while saving turf

- 2.1 Saving turf means working out on the open bog, often for up to eight hours a day on long summer days. T6 lies to the east of the bog and T2 to the south, both at about 600 metres, with turbines up to 180 metres tall. When the sun is behind a turbine, the rotating blades cast moving shadows across the ground, and early on summer mornings the sun rises behind T6 as seen from my bog. Depending on weather this work can take place anytime between 06:00 and 23:00.
- 2.2 The shadow flicker assessment in Chapter 5 considers only houses. It does not consider people working outdoors near the turbines, such as turf cutters and farmers, who may be exposed for many hours at a time. Working for hours under repeated moving shadows is unpleasant and disorientating, and a flickering shadow is a distraction when operating a tractor or turf-cutting machine on soft, uneven ground. I ask that the applicant be required to assess shadow flicker at my bog, and at other turf banks and farmland close to the turbines, during the cutting season; and that, where shadow flicker would affect people working there, the turbines concerned be curtailed during those periods, as the EIAR already proposes for houses.

3. Drainage and the condition of the bog

- 3.1 A turf bank depends on its natural water balance. Widening the road beside my bog is likely to involve new or deepened roadside drains, and construction of T2, T6, their hardstands and access tracks, the substation and the peat and spoil storage areas all involve excavation and drainage within about 600 metres. Over-drainage can dry out and crack the banks, while diverted run-off can leave them waterlogged and impossible to cut. Either would damage a bog my family has worked for over 50 years.
- 3.2 I ask that the applicant be required to show the drainage design for the road upgrade beside my bog; to demonstrate that no works will lower the water table of, or divert run-off onto, the bog; and to monitor the bog during construction, with any damage made good at the applicant's cost.

4. Peat stability

- 4.1 The EIAR records peat depths of up to 4.4 metres on the site (Appendix 8-1), and the Emergency Response Plan in the Decommissioning Plan (Appendix 4-6, Section 5.1.5) sets out procedures in case of a peat slide. Excavation for turbine foundations, tracks and spoil storage in deep peat within about 600 metres of a working bog is a real concern for anyone working there. I ask that my bog be included in the peat stability monitoring for the project; that I be informed immediately of any peat movement detected nearby; and that no spoil or peat be stored where it could move towards the bog.

5. Dust, noise and safety

- 5.1 Construction dust settling on spread and footed turf, and on the banks, affects its quality and drying. Construction noise, and in time turbine noise, will change what has always been a quiet place to work. I ask that dust suppression be applied on the access road and nearby works during the cutting season, and that the applicant ensure that no construction vehicles, plant or materials are parked or stored on, or across the access to, my bog.

6. Conclusion

I do not oppose renewable energy, but turbary rights and the tradition of saving turf are part of life in this area, and this application does not recognise them. If the Commission is minded to grant permission, I ask that conditions be attached to maintain access to my bog throughout construction, especially during the turf season; to identify and consult all turbary rights holders; to assess shadow flicker at turf banks and farmland near the turbines and curtail the turbines where needed; to protect the drainage and stability of the bog; and to make good any damage at the applicant's cost.

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Emlyn Lang

Appendix A: Location of the turf bog

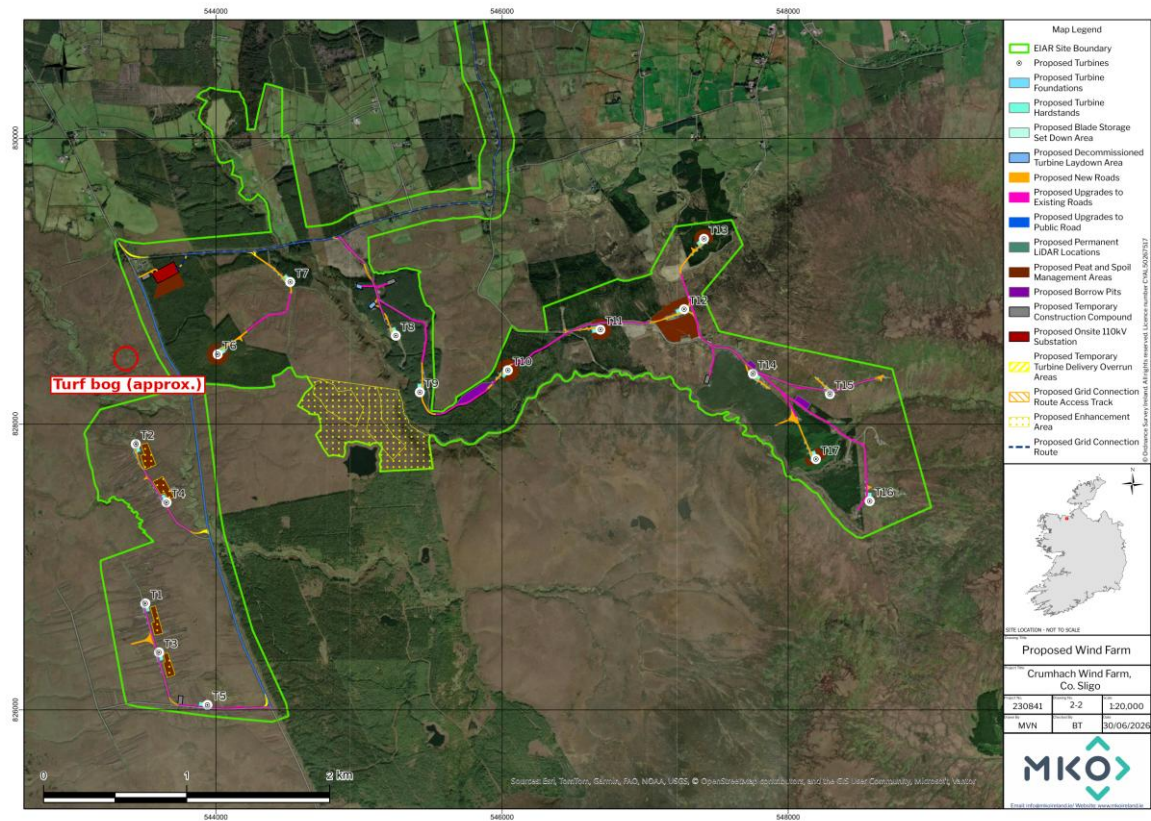


Figure 2-2 "Proposed Wind Farm", from the applicant's Decommissioning Plan (Appendix 4-6 of the EIA). The approximate position of the turf bog (ITM E 543370, N 828458) has been circled in red. The green line is the site boundary, and the blue line along the western edge of the site is the public road proposed to be upgraded.