

AN COIMISIÚN PLEANÁLA	
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14 SEP 2026	
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Time:	9:15 By: RUS/1017

OBSERVATION

Crumhach Wind Farm, Co. Sligo

An Coimisiún Pleanála Case PAX21.324561

Observer	Shane and Michelle Lang
Address	Leharrow Cross, Dromore West, Co. Sligo, F26 A292
Property	Residential property immediately adjoining Location 17
Applicant	SSE Renewables (Ireland) Ltd
Primary issues	Flood/drainage risk; night-time abnormal- load noise and light disturbance; residential and emergency access; property rights; electricity and telecommunications infrastructure; delivery route accommodation works

This observation is focused on the specific impacts arising at the point identified by the applicant as “Location 17”.

Official case page – <https://www.pleanala.ie/en-ie/case/324561>

To: An Coimisiún Pleanála

Re: Case PAX21.324561 – Proposed Crumhach Wind Farm, Co. Sligo

Applicant: SSE Renewables (Ireland) Ltd

Observer: Shane and Michelle Lang

Address: Leharrow Cross, Dromore West, Co. Sligo, F26 A292

Dear Sir/Madam,

We wish to make an observation in relation to the above planning application. We are the owners/occupiers of the residential property immediately adjoining the point identified as “Location 17” in the applicant’s turbine delivery route documentation.

Our concerns are not a general objection to wind energy. They arise from the particular engineering works and abnormal load manoeuvre proposed immediately beside our home, and from the adequacy of the submitted assessment of the consequences for drainage and flood risk, night-time residential amenities, access and private property.

1. Executive summary of concerns

- Location 17 is a specifically engineered abnormal load manoeuvring point. The applicant’s own documentation identifies hedgerow removal, preparation of an existing overrun hardstand for vehicle axle loading, a temporary runover area and visibility splays at this junction.
- The applicant’s Autotrack drawing models a manually steered vehicle/load combination approximately 77.8 m long carrying a 74 m blade and shows separate wheel, vehicle body and blade/load envelopes.
- An existing roadside drain is located directly beside our property and the proposed accommodation works. The Surface Water Management Plan only states that road widening or improvement works will be undertaken on the opposite side of a drain “where possible”, while also allowing drains to be diverted or blocked subject to alternative drainage provision.
- An existing stone-built culvert passes beneath the public road within the immediate Location 17 area and forms part of the local drainage network. We have not identified a Location 17-specific assessment establishing its precise position, construction, condition, hydraulic capacity or structural capacity relative to the proposed abnormal-load wheel/axle loading. Nor have we identified a Location 17-specific hydraulic assessment demonstrating that the proposed overrun/hardstand works will not reduce drainage capacity or increase flood risk to our property.
- Flood risk is a material issue for our property in practice: household insurance availability is already severely restricted because of flood risk.
- Abnormal-load delivery may occur outside normal construction hours, but the submitted night-time noise scenario appears to model fixed generators/lights at temporary compounds rather than the complete abnormal-load movement beside our dwelling. This includes the constrained Location 17 manoeuvre immediately beside the house and the subsequent crossing of the N59 crossroads, which is in

close proximity to our home, during which, given the approximately 77.8 m vehicle/load length, part of the transporter and accompanying escort activity may remain beside or close to the dwelling. Both children's bedrooms are located at the front of the dwelling facing the road and Location 17 manoeuvring area. The potential night-time disturbance is not limited to vehicle noise but also includes headlights, warning beacons and other lighting associated with abnormal-load and escort vehicles and support personnel immediately beside the dwelling. This reinforces the need for Location 17 specific assessment and controls to minimise avoidable night-time disturbance.

- The final relationship between the wheel/body/load envelopes and our registered folio boundary has not been demonstrated on a survey-grade cadastral overlay.
- Electricity and telecoms infrastructure: Existing electricity poles are located beside the Location 17 turbine delivery route. An illustrative comparison with the Applicant's Autotrack drawing indicates a potential conflict between the 74 m blade/load swept envelope and existing poles, including a pole forming part of the electricity connection serving our dwelling. A survey-grade assessment is required to demonstrate clearance and identify any necessary utility works and their effect on electricity and telecommunications services to the dwelling.
- We therefore request further information specific to Location 17 and, if permission is granted, clear and enforceable conditions protecting drainage capacity and flood risk, residential amenity from night-time noise and light disturbance, residential and emergency access, electricity supply and infrastructure, and private property rights.

2. Location 17 requires specific physical accommodation works

The submitted Construction Noise Report expressly describes the local road network works required along the turbine delivery route. For Location 17 it records a requirement for hedgerow vegetation removal, clearing and preparation of an existing overrun hardstand for vehicle axle loading, a temporary runover area and visibility splays. This establishes that Location 17 is not merely a point at which a truck passes on the existing carriageway; it is a location at which specific ground and roadside works are proposed.

The observer's site photographs also show the physical relationship between the boundary wall, the adjoining hedgerow and the proposed overrun area. The hedgerow identified by the observer as the hedgerow marked for removal lies immediately beside the field shown experiencing high-water conditions in 2024. We do not suggest that hedgerow removal will itself cause flooding; however, the applicant should identify whether removal involves roots, bank material, excavation or regrading and demonstrate that the works will not alter drainage or flood conveyance at this sensitive location.

The dedicated Autotrack drawing, WCH-CVL-SK-0011-04, Sheet 004 of 007, is titled "Turbine Delivery Route – Location 17". It models a manually steered vehicle carrying a 74m blade, with a stated vehicle/load length of approximately 77.8 m. Separate wheel, vehicle body and load/blade envelopes are shown. We request that the Commission assess the

accommodation works and the abnormal load manoeuvre as one combined site-specific impact.

3. Flood risk and the existing roadside drain

This is one of our principal concerns. An existing roadside drain is located directly beside our property and adjacent to the area affected by the Location 17 works. Any change to drain cross section, culvert capacity, verge levels, road levels, hard standing permeability or overland flow paths could have consequences for an already flood sensitive residential property.

The observer has provided photographs (Appendix E) taken during periods of heavy rainfall in 2024 showing actual high-water/flood conditions in the immediate Location 17 area. These photographs are examples of a recurring local condition and should not be interpreted as evidence of a single isolated event confined to 2024. During periods of sustained or heavy rainfall, high water levels are regularly experienced in this immediate area, including within the drainage channel and adjoining low-lying lands beside Location 17. The observer has witnessed such conditions on numerous occasions. The 2024 photographs show inundation in the field beside the observer's boundary wall and substantial water within and around the drainage area directly across the road beside the proposed swept path/overrun works. They are included at Appendix E. They are not relied upon as proof that the proposed works will cause flooding; rather, they demonstrate the existing and recurring hydraulic sensitivity of the precise location and reinforce the request for a Location 17-specific drainage and hydraulic assessment.

There is also an existing stone-built culvert/drain passing beneath the public road in the immediate Location 17 area and forming part of the local drainage network (see Appendix F). The observer's annotated aerial image indicates its approximate location; the annotation is not survey-grade. The Applicant's Location 17 Autotrack drawing shows the wheel, vehicle-body and blade/load swept envelopes but does not identify this culvert. We have not identified in the submitted Autotrack or drainage drawings an assessment establishing its precise position, construction, dimensions, depth of cover, structural condition or load-bearing capacity relative to the proposed abnormal-load wheel/axle loading. This is notable because the Applicant's Autotrack documentation expressly identifies a "STONE CULVET" at another turbine-delivery-route location (Location 19).

Given the existing recurring high-water conditions at Location 17, any cracking, settlement, displacement or partial obstruction of this drainage structure could potentially have consequences not only for road integrity but also for the continued hydraulic conveyance of water beneath the road. We therefore request that its structural and hydraulic suitability for the proposed abnormal-load movements be demonstrated before turbine deliveries are authorised.

The Surface Water Management Plan states that existing drains near tracks are to be maintained in their present location "where possible". It further states that, where road widening or improvement works are necessary, the works will take place on the opposite side of the road to the drain "where possible". The same plan envisages circumstances where drains may be diverted or blocked, with alternative drainage put in place first. These

are general and qualified drainage principles, but they do not demonstrate what is proposed for the specific drain at Location 17. We have not identified in the submitted documents a Location 17 specific hydraulic assessment demonstrating any of the following:

- Existing drain and culvert dimensions, invert levels, condition and hydraulic capacity;
- Catchment area and peak design flows presently conveyed at this location;
- Existing and proposed road/verge/runover levels immediately beside our property;
- Whether the temporary runover area or axle load preparation will reduce permeability or occupy existing flood storage;
- Whether any culverting, piping, narrowing, diversion or regrading of the drain is required;
- How drainage capacity will be maintained during construction and during turbine deliveries;
- Whether altered surface runoff could be directed towards our entrance or dwelling; and
- Confirmation that the works will not increase flood depth, frequency or duration at our property.

The applicant's Flood Risk Assessment itself recognises the planning objective of avoiding development that increases flood risk elsewhere, including flood risk arising from surface water runoff. It also acknowledges that creation of impermeable areas can increase downstream runoff and flood severity, and states that project drainage is intended to prevent an increase above existing discharge rates. We respectfully submit that this principle needs to be demonstrated at the Location 17 accommodation works rather than inferred from the wider windfarm assessment.

4. Local flood risk context and insurance vulnerability

Flood risk in Dromore West is independently recognised in Sligo County Council's Strategic Flood Risk Assessment. The Council's SFRA identifies lands associated with existing developments in Dromore West overlapping Flood Zones A and B. This does not by itself establish the precise flood zone classification of our individual dwelling, but it is relevant independent evidence that the local flood risk context is real and should not be dismissed by reference only to the wider windfarm site being predominantly classified as Flood Zone C.

Our concern is also practical rather than theoretical. Because of flood risk we can presently obtain suitable household insurance from only one provider. We do not suggest that the proposed development will necessarily make the property uninsurable. We do submit, however, that any reduction in drainage capacity or worsening of flood risk could have serious consequences for the physical property and its future insurability.

Independent source: Sligo County Council – Strategic Flood Risk Assessment for the Sligo County Development Plan 2024 -2030

(<https://www.sligococo.ie/cdp/Environmentalreports/SFRA%20Report.pdf>)

5. Drainage detail should not be deferred until after permission

The Surface Water Management Plan describes itself as a working document which will require updating before and during construction. It also indicates that some drainage details and check dam requirements will be confirmed following pre-construction survey and detailed design. Normal construction stage refinement is understandable; however, at Location 17 the fundamental issue is whether known roadside accommodation works can be undertaken without compromising the existing drain beside an existing flood sensitive dwelling.

We request that the Commission require the relevant Location 17 hydraulic and drainage information before the works are authorised, rather than leaving the central question of drain capacity and flood impact solely to a contractor's later detailed design.

6. Drainage and flood risk safeguards requested

- A pre-construction topographical and drainage survey of Location 17 and the drainage feature immediately adjoining our property.
- Surveyed existing and proposed cross sections and spot levels through the Location 17 works, including the overrun/runover area, road, roadside drain/ditch, adjoining hedgerow/verge and our boundary wall, together with the drain and any culvert invert levels and condition.
- A Location 17 specific hydraulic assessment by a suitably qualified hydrologist/engineer comparing existing and proposed conditions. It should quantify, where applicable, drain/culvert capacity, design flows, flood conveyance and storage, runoff paths and the effects of filling, compaction, culverting, ditch alteration and changes in ground level, and demonstrate no increase in flood depth, frequency, duration or risk to our property for appropriate design storm and climate change scenarios.
- A surveyed structural and hydraulic assessment of the existing stone culvert beneath the road at Location 17, showing its exact position relative to the Autotrack wheel envelope, its dimensions, construction, condition and depth of cover, together with the proposed transporter wheel/axle loads and engineering verification that the structure can safely accommodate the proposed abnormal-load movements without structural damage, settlement or reduction in hydraulic capacity.
- No infilling, narrowing, piping, culverting, diversion or raising of the existing drain unless the hydraulic design demonstrates that existing capacity is maintained or improved and flood risk to third party property is not increased.
- No raising or regrading of the road, verge, hardstand or runover area in a manner that blocks existing overland flood routes or redirects runoff toward our property.
- Maintenance of the drainage system in a fully operational condition throughout construction and turbine deliveries, with inspections before and after works and after significant rainfall.

- Immediate removal of sediment, debris or construction material entering the drain because of the project.
- A post-construction survey demonstrating that drainage capacity, levels and flow paths have been restored or improved, together with prompt remediation of any project related drainage defect.

7. Night-time abnormal load noise and sleep disturbance

The Construction Noise Report states that core construction hours are generally 07:00–19:00 Monday to Friday and 07:00–13:00 on Saturdays but expressly acknowledges that delivery and unloading of abnormal loads may occur outside those hours. The report adopts a Category A night-time threshold of 45 dB LAeq,T for 23:00–07:00.

However, the night-time modelling scenario described in the report appears to comprise generators and lighting operating at temporary construction compounds. We have not identified a site-specific acoustic calculation for the abnormal-load convoy actually negotiating the Location 17 turn immediately beside our home during sleeping hours.

The Applicant's own baseline traffic survey also provides important context for the existing night-time environment. Appendix 15-1 (Traffic Count Data) contains a Manual Classified Junction Turning Count undertaken at Site 01, L63072/N59/L2702, on Tuesday 10 March 2026. While the N59 itself continued to carry some traffic overnight, the survey records no vehicle movements between 00:00 and 05:45 for several of the other turning movements at this junction. This provides evidence of the extremely low level of overnight traffic associated with parts of the local road junction environment through which the turbine delivery route passes. Against that baseline, the proposed repeated abnormal-load convoys, escort vehicles and associated traffic-management activity during the night would represent a marked change in the existing night-time traffic environment. This reinforces the need for the Applicant to assess the actual noise associated with the slow-speed abnormal-load manoeuvre at Location 17 immediately beside the dwelling.

This distinction matters. The Applicant's own noise methodology acknowledges that a mobile source modelled along a route may produce a higher short-duration level when it is directly opposite a receptor. At Location 17, the proposed vehicle is not an ordinary HGV travelling past at normal road speed; the Autotrack drawing shows a manually steered, approximately 77.8 m vehicle/load combination undertaking a constrained low-speed turn immediately beside the dwelling. After negotiating this bend, the convoy then continues south to the crossroads with the N59, which it must cross in order to continue along the turbine delivery route.

Because of the exceptional length of the transporter and load, the potential disturbance to our dwelling does not necessarily end once the front of the vehicle reaches the N59 junction. When the front of the approximately 77.8 m vehicle/load combination is at or negotiating the crossroads, a substantial part of the vehicle will still extend back along the local road beside or very close to our home, together with rear escort vehicles and associated traffic-management activity. The relevant night-time event should therefore be assessed as the complete abnormal-load movement through this immediate area, including the constrained

turn at Location 17, the short onward movement to the N59 crossroads, the crossing of that junction, and any reasonably foreseeable stopping, waiting, restarting, acceleration, escort or traffic-control activity. Relevant event/maximum noise levels, as well as the applicable average level at the dwelling, should be reported for any proposed night-time delivery window.

8. Residential amenity and night-time disturbance

The proposed abnormal-load deliveries would involve repeated night-time activity immediately beside our home. Both of our children's bedrooms are located at the front of the house, facing the road and the Location 17 manoeuvring area. Our concern is therefore not limited to noise. The passage and slow-speed manoeuvring of a very large abnormal-load vehicle and its escort vehicles immediately outside the dwelling may also involve headlights, warning beacons and other vehicle lighting during normal sleeping hours. Because of the constrained nature of the Location 17 turn, any stopping, waiting, restarting or traffic-management activity could prolong both noise and light disturbance immediately outside the dwelling.

Given the immediate proximity of the dwelling, and particularly the location of the children's bedrooms facing the delivery route, we request that the night-time impact of the actual Location 17 manoeuvre be specifically considered in terms of both noise and intrusive vehicle/escort lighting. Reasonable measures should be imposed to minimise avoidable disturbance, including avoiding the Location 17 manoeuvre between 23:00 and 07:00 where reasonably practicable and ensuring that lighting associated with deliveries and traffic management is limited to that necessary for safe operation and is managed, where practicable, to minimise unnecessary illumination of the adjoining dwelling.

9. Abnormal load delivery controls requested

- Where reasonably practicable, no abnormal load manoeuvre at Location 17 between 23:00 and 07:00.
- If night-time movement is demonstrated to be unavoidable, a Location 17 specific acoustic assessment and mitigation plan should be agreed in advance.
- Direct written advance notice to our household of each planned abnormal load movement, with the anticipated date and delivery window.
- No convoy staging, queuing or unnecessary waiting beside our property.
- No unnecessary engine idling, horn use or audible warning activity beyond that strictly required for safety.
- Vehicle, escort and traffic-management lighting at Location 17 should be limited to that reasonably required for safe operation and, where practicable, positioned and operated so as to minimise unnecessary illumination of the adjoining dwelling.
- All delivery vehicles and escort vehicles maintained with effective exhaust silencers.
- A named Traffic Management Coordinator and a 24-hour contact number available during every abnormal load movement.
- A documented complaint, investigation and corrective action procedure.

10. Residential and emergency access

The geometry shown on the Autotrack drawing demonstrates that Location 17 requires a substantial manoeuvre and traffic control. We request an express Location 17 access management condition requiring reasonable residential access and emergency access to be always maintained. Our entrance and property should not be used for convoy staging, parking, waiting, turning or manoeuvring without our express consent. Each planned convoy should be individually notified in advance, and any unavoidable temporary restriction should be kept to the shortest practicable duration with a clear procedure for urgent entry or exit during a movement.

11. Private property, folio boundary and oversail

The available drawings do not provide a survey-grade combined plan showing the registered folio boundary, public road boundary, land controlled by the applicant, and the complete wheel, body and turbine blade/load envelopes. Our property immediately adjoins Location 17 junction and a small parcel understood to be controlled by SSE for the current project.

The applicant's Design Flexibility Form states that "Temporary accommodation works associated with the turbine delivery route are contained within the public road corridor and will be reinstated following the construction stage." At Location 17, however, the submitted Autotrack drawing does not identify registered property boundaries. It is therefore not possible for us, or readily apparent from the submitted drawing, to verify that all temporary accommodation works required at Location 17 can in fact be accommodated entirely within the public road corridor and lands available to the applicant. This is particularly important given the extent of the swept-path/overrun area, hedgerow removal and other accommodation works identified at this location. We therefore request that this statement be demonstrated by a survey-grade drawing showing the public road corridor and registered property boundaries together with the full extent of all Location 17 accommodation works and the relevant wheel, vehicle body and load/blade envelopes.

We request a survey-grade cadastral/CAD overlay prepared from a current site survey, showing our registered folio boundary and stone boundary wall together with the public road boundary, all applicant-controlled land, complete wheel envelope, vehicle body envelope, blade/load envelope, visibility splays, hedgerow/vegetation removal, overrun/runover works and all temporary construction limits. The drawing should expressly confirm whether any part of the vehicle, load/oversail or physical work enters, oversails, undermines or otherwise affects our registered property. We do not allege encroachment on the basis of the presently available drawings; we ask that the applicant demonstrate the position accurately.

For the avoidance of doubt, this observation does not grant any permission, consent, license, easement, access right, oversail right or other civil right over our property folio. Any such rights are expressly reserved and are separate from the planning process.

12. Hedgerow, hardstand and reinstatement

The application identifies hedgerow removal and preparation of an existing overrun hardstand for vehicle axle loading at Location 17. We request precise surveyed plans and a construction specification showing the ownership and extent of hedgerow removal; whether

roots/bank material will be removed; excavation depth; imported fill/stone and any geogrid or similar reinforcement; compaction method; existing and proposed ground/finished levels; permeability and drainage arrangements; proximity to the existing drain; construction limits; and the exact reinstatement specification after the final turbine delivery. The phrase “prepared for vehicle axle load” is not, in our submission, sufficient detail at a location with demonstrated high-water conditions.

Reinstatement should include drainage capacity, verge levels, road edge, boundary features, vegetation and surface water flow paths, and should be verified by pre and post-construction condition surveys.

12A. Existing electricity poles and blade/load swept path

Existing electricity and telecommunications poles and associated overhead services are located immediately alongside the turbine delivery route at Location 17. Comparison of the Applicant's Appendix 15-3 Autotrack drawing with Street View imagery indicates that at least one existing electricity pole and a telecommunications pole may lie within or very close to the area swept by the 74 m blade/load envelope. Please refer to Appendix G, where we have marked the approximate positions of the visible poles on a copy of the Applicant's drawing for illustrative purposes. These markings are not survey-grade and are not relied upon as proof of the precise position of the poles; rather, they identify an apparent physical conflict which is not resolved by the submitted Location 17 drawing.

This issue has a direct potential consequence for our property. The electricity pole which appears from the illustrative comparison to lie within the blade/load swept envelope forms part of the overhead electricity connection serving our dwelling, with the electricity line continuing from this pole towards the pole immediately beside our property.

Telecommunications infrastructure is also located within the same immediate roadside area. If relocation, temporary removal, disconnection or alteration of either the electricity or telecommunications infrastructure is required to accommodate turbine delivery, this will directly affect utility services to our home. Continuity of these services is particularly important because, in addition to their normal residential use, we also work from home and depend upon reliable electricity and telecommunications services to do so.

We have not identified within the submitted Location 17 documentation a surveyed assessment showing the precise position of these existing utility poles and associated overhead services relative to the blade/load envelope, demonstrating that they can remain safely in place during the manoeuvre, or identifying what utility works would be required if they cannot. Given the apparent proximity of this infrastructure to the submitted swept path, we consider that this issue should be resolved before permission is determined rather than being left solely to detailed arrangements at construction or turbine-delivery stage.

We therefore request that the Applicant be required to provide a survey-grade Location 17 drawing showing the precise position of all existing electricity and telecommunications poles, associated overhead services and other fixed roadside infrastructure together with the complete wheel, vehicle-body and blade/load envelopes, and to demonstrate the required clearance. If any pole, electricity line or telecommunications infrastructure requires temporary or permanent removal, relocation, protection, disconnection or alteration to

facilitate turbine delivery, the Applicant should identify the proposed works, the necessary approvals and third-party involvement, the likely nature and duration of any service interruption, and the measures that will be put in place to maintain or otherwise protect continuity of electricity and telecommunications services to our dwelling.

13. Pre and post-construction condition survey

Given the axle loads, temporary works and proximity to our home, we request a dated photographic and measured condition survey before works commence, covering our roadside boundary, entrance, gateposts, stone boundary wall, walls/fences, hedgerow, verge, drain, culvert, driveway and the immediately adjoining public road. The survey should record the existing condition and, where appropriate, levels of the stone wall. Construction methods for hedge/root removal, excavation and compaction should be selected so as not to undermine, destabilise or damage the wall. A corresponding survey should be undertaken after the final abnormal load and after reinstatement, with project related damage promptly made good at the developer's expense.

14. Cumulative effect at this dwelling

The impact at Location 17 should not be considered solely by reference to the passage of the blade transporter past the dwelling. The overall impact on this property comprises the preparatory accommodation works, including vegetation clearance and construction or strengthening of the overrun/runover area; works potentially affecting drainage, the existing stone culvert, electricity or telecommunications infrastructure; repeated night-time abnormal-load convoys and associated escort and traffic-management activity; the constrained manoeuvre beside the dwelling; potential effects on residential and emergency access; and subsequent reinstatement works.

These activities may occur at different stages, but they affect the same immediate residential location. We therefore request that the Commission assess their combined and cumulative effect on the adjoining dwelling rather than considering the drainage, traffic, noise, lighting, utility, access and reinstatement issues only in isolation.

15. The TDR hydrology assessment does not answer the Location 17 flood conveyance question

Chapter 9 of the EIAR contains a specific section entitled “Potential Effects from Turbine Delivery Route Works”. That section identifies the pathway as surface water flow paths and the receptor as downgradient surface water quality. It describes the TDR earthworks as minor and localised and relies on reinstatement and pre-construction drainage measures to conclude that no significant effect on surface waters will occur.

This assessment is relevant to sediment and water quality protection, but it does not demonstrate the separate issue that concerns our property: whether the physical works at Location 17, including preparation of the overrun area, temporary runover works, vegetation removal, altered ground levels or any intervention with the roadside drain, could reduce hydraulic conveyance or redirect floodwater toward the adjoining dwelling.

We therefore request that the Commission distinguish between an assessment of downstream surface water quality and a site-specific assessment of flood conveyance at the roadside drain. In our submission, the former does not substitute for the latter.

16. The interactions assessment is too general for the combined impacts at Location 17

Chapter 17 considers the interaction between population/human health and material assets. It states that abnormal loads and increased construction traffic are likely to create short-term inconvenience for road users, together with dust and exhaust emissions, and relies on the Traffic Management Plan to minimise disruption.

That broad assessment does not appear to address the combination present at Location 17: a known abnormal load pinch point immediately beside a dwelling, repeated night-time turbine deliveries, a constrained turning manoeuvre, potential temporary interference with residential access, physical accommodation works and an existing roadside drainage feature in a flood sensitive locality.

We request that these effects be considered together at Location 17 rather than being treated only as separate traffic, noise and drainage issues.

17. The formal mitigation schedule does not provide Location 17 specific protections

Chapter 18 confirms that turbine components are intended to be transported at night. It estimates approximately 120 abnormal sized loads, comprising 45 convoys over 45 separate nights, spread over approximately nine weeks. It also provides for Garda and haulage company escort vehicles.

The mitigation schedule provides generic notification to locals by letter drops and posters, a Project Coordinator and an out-of-hour emergency number. It also provides for pre- and post-construction road-condition surveys only where required by the local authority, and states that road surfaces and boundaries will be reinstated to predevelopment condition.

We have not identified in that formal schedule a specific protection for the household adjoining Location 17 addressing the existing drain, guaranteed residential/emergency access, direct individual notification of each convoy, night-time noise at the dwelling, or a property specific condition survey. Given that Location 17 is already recognised as requiring engineered accommodation works, we request that these protections be made explicit and enforceable.

18. Further information / conditions requested

Before determining that the Location 17 works are acceptable, we respectfully request that the Commission obtain or require the following:

- A survey-grade cadastral/CAD overlay based on a current site survey showing the complete Autotrack wheel/body/load envelopes, our registered folio boundary and stone wall, public road boundary, all applicant-controlled land, vegetation removal and all temporary works.

- A final Location 17 works drawing and construction specification showing hedgerow/root/bank removal, visibility splays, existing hardstand, temporary runover area, excavation/fill/compaction details, existing and proposed spot levels/cross sections, drainage arrangements, construction limits and reinstatement limits.
- A Location 17 specific drainage/hydraulic assessment comparing existing and proposed conditions at the roadside drain/ditch and any culvert, including capacity, design flows, flood conveyance/storage, runoff paths, existing/proposed levels and confirmation of no increased flood risk to our property.
- A surveyed structural and hydraulic assessment of the existing stone culvert beneath the road at Location 17, showing its precise position relative to the Autotrack wheel envelope, dimensions, construction, condition and depth of cover, together with the proposed transporter wheel/axle loads and engineering verification that the structure can safely accommodate the proposed abnormal-load movements without structural damage, settlement or reduction in hydraulic capacity.
- A site-specific acoustic assessment of the complete abnormal-load movement in the immediate vicinity of the dwelling for any proposed evening/night delivery window, including the Location 17 manoeuvre, onward movement to and crossing of the nearby N59 crossroads, and any reasonably foreseeable stopping, waiting, restarting, escort or traffic-management activity, with relevant event/maximum noise levels as well as the applicable averaged metric at the dwelling.
- A binding Location 17 delivery/access management protocol protecting sleep, residential and emergency access, providing individual advance notification, and prohibiting use of our entrance/property for staging, waiting or manoeuvring without consent.
- Pre and post-construction condition surveys expressly including the folio boundary, together with construction controls to prevent undermining/damage and enforceable reinstatement obligations.
- Confirmation that no private land or airspace will be used or affected without the consent of the relevant landowner(s) and all the necessary easements, wayleaves, oversail rights or other civil rights being in place.
- A survey-grade utility and swept-path drawing for Location 17 showing all existing electricity and telecommunications poles, overhead services and other fixed roadside infrastructure against the complete blade/load envelope, together with confirmation of whether any utility infrastructure serving the adjoining dwelling requires removal, relocation, protection, disconnection or alteration and, if so, details of the proposed works, necessary third-party involvement and measures to protect continuity of electricity and telecommunications services to the dwelling.

19. Conclusion

The Applicant has identified Location 17 as requiring a substantial abnormal-load manoeuvre and specific accommodation works immediately beside our home. In that context, we consider the outstanding questions concerning drainage and flood risk, the

structural and hydraulic suitability of the existing stone culvert, night-time abnormal-load noise and light disturbance, residential and emergency access, electricity and telecommunications infrastructure, private property boundaries and rights, and reinstatement to be material planning matters.

We are not asserting that the Location 17 works will inevitably cause flooding, damage to the existing culvert, unacceptable noise or light disturbance, interruption to utility services, restriction of access or interference with private property. Our submission is that the current documentation does not adequately demonstrate, at this sensitive location, that these effects will be avoided or appropriately mitigated. We therefore respectfully request that An Coimisiún Pleanála require the Location 17-specific information identified in this observation before determining the application.

If the Commission is minded to grant permission, we request that the safeguards described in this observation be incorporated as clear, objective and enforceable conditions specific to Location 17, rather than being left solely to post-consent agreement between the developer, contractor and roads authority.

Yours faithfully,

Observer signature and contact details

Signature	Shane Lang Michelle Lang
Name	Shane and Michelle Lang
Address	Leharrow Cross, Dromore West, Co. Sligo, F26 A292
Telephone	087 636 0080
Email	shaneylang@gmail.com
Date	11 - SEPT - 2026

Schedule of references relied upon

Ref.	Document and exact location	Information relied upon
R1	Applicant Appendix 15-3 – Autotrack Assessment Drawings Location 17 drawing WCH-CVL-SK-0011-04, Sheet 004 of 007, "Turbine Delivery Route – Location 17".	Manually steered vehicle; 74 m blade; approximately 77.8 m vehicle/load; separate body, wheel and load outlines.
R2	Applicant Appendix 12-1 – Construction Noise Report PDF p.19 (report p.12), Section 4.1.	Location 17 accommodation works: hedgerow vegetation removal; clearing/preparation of existing overrun hardstand for axle loading; temporary run-over area; visibility splays.
R3	Applicant Appendix 12-1 – Construction Noise Report PDF p.14 (report p.7), Section 3.1.	Mobile-source methodology: a moving source may be averaged along a path; the report acknowledges that noise can be higher for a short period when directly opposite a receptor.
R4	Applicant Appendix 12-1 – Construction Noise Report PDF p.17 (report p.10), Table 3-2.	BS 5228 Category A night-time threshold: 45 dB LAeq,T for 23:00–07:00.
R5	Applicant Appendix 12-1 – Construction Noise Report PDF p.20 (report p.13), Section 4.2.	Night-time model scenario described as generators and lights operational at all temporary construction compounds (TCCs).
R6	Applicant Appendix 12-1 – Construction Noise Report PDF p.25 (report p.18), Section 5.	Core construction hours and acknowledgement that delivery/unloading of abnormal loads may occur outside core hours; good-practice noise controls.
R7	Applicant Appendix 15-1 – Traffic Count Data PDF pp.7, 10, 13 and 16; Site 01, L63072/N59/L2702; Tuesday 10 March 2026.	Overnight 15-minute turning-count tables for Movements 1–3, 4–6, 7–9 and 10–12. These pages support the observation's qualified description of very low overnight activity for several movements while other movements continued to carry traffic.
R8	Applicant Appendix 4-4 – Surface Water Management Plan PDF p.4 (SWMP p.1), Section 1.	SWMP described as a working document requiring further development/updates before and during construction.
R9	Applicant Appendix 4-4 – Surface Water Management Plan PDF p.6 (SWMP p.3), Section 2.1.	Existing drains maintained in present location "where possible"; drains may be diverted/blocked after alternative drainage is provided; road widening/improvement on opposite side of drain "where possible".
R10	Applicant Appendix 4-4 – Surface Water Management Plan PDF p.11 (SWMP p.8), drainage design detail.	Locations/requirements for check dams to be confirmed during finalisation of detailed drainage design following a pre-construction survey.
R11	Applicant Appendix 4-4 – Surface Water Management Plan PDF p.23 (SWMP p.20), Section 3.2.2 "Pre-Construction Drainage".	Main-drain inspections; pre-commencement drainage controls; check dams/silt fences along existing roadside drains; repeated drain-diversion/blocking and road-widening principles.
R12	Applicant Appendix 9-1 – Flood Risk Assessment PDF p.18 (FRA p.13), Sections 4.1–4.2.	Flood-risk objectives include avoiding development that increases flood risk elsewhere, including from surface-water runoff.
R13	Applicant Appendix 9-1 – Flood Risk Assessment PDF p.20 (FRA p.15), Section 4.3.3.	Applicant review of OPW Past Flood Event Mapping and its conclusion for the Proposed Wind Farm site.
R14	Applicant Appendix 9-1 – Flood Risk Assessment PDF p.23 (FRA p.18), Sections 4.3.4–4.3.6.	GSI Winter 2015/2016 surface-water mapping, CFRAM mapping and National Indicative Fluvial Mapping (NIFM) discussion.
R15	Applicant Appendix 9-1 – Flood Risk Assessment PDF p.26 (FRA p.21), Sections 4.3.9–4.3.10.	Climate-change scenarios and summary conclusion that Proposed Wind Farm infrastructure is in Fluvial Flood Zone C.
R16	Applicant Appendix 9-1 – Flood Risk Assessment PDF p.27 (FRA p.22), Table B.	Source–Pathway–Receptor assessment of fluvial, pluvial, surface-water, groundwater and coastal/tidal flood sources.
R17	Applicant Appendix 9-1 – Flood Risk Assessment PDF p.31 (FRA p.26), Section 5.3.	Acknowledges that impermeable areas can increase runoff/downstream flood risk and states drainage is designed to prevent an increase in discharge rates above the undeveloped site.

Ref.	Document and exact location	Information relied upon
R18	Applicant EIAR Chapter 9 – Hydrology and Hydrogeology PDF pp.71–72, Section 9.5.2.11 “Potential Effects from Turbine Delivery Route Works”.	TDR works assessed principally through surface-water flow paths / downgradient surface-water quality; works described as minor/localised with mitigation/reinstatement.
R19	Applicant EIAR Chapter 17 – Interaction of the Foregoing PDF p.10, Population/Human Health and Material Assets interaction.	Abnormal loads/increased construction traffic addressed as short-term inconvenience, with dust/exhaust and reliance on the Traffic Management Plan.
R20	Applicant EIAR Chapter 18 – Schedule of Mitigation and Monitoring Measures PDF pp.88–89, MM115–MM117.	Night-time abnormal-load transport; approximately 120 abnormal-sized loads / 45 convoys over 45 nights (approximately nine weeks); Garda/haulage escorts; local notification/contact and road-condition/reinstatement measures.
R21	Applicant Design Flexibility Form PDF p.4 (description of proposed development / wider project).	States that temporary accommodation works associated with the turbine delivery route are contained within the public road corridor and will be reinstated following construction.
R22	Sligo County Council – Strategic Flood Risk Assessment, Sligo County Development Plan 2024–2030 Dromore West settlement entry.	Identifies lands associated with existing developments in Dromore West overlapping Flood Zones A and B; used as wider local flood-risk context, not as a property-specific flood-zone determination.
R23	OPW Floodinfo.ie – National Indicative Fluvial Maps: User Guidance Notes Sections “Use of the National Indicative Fluvial Maps for the Purposes of Planning”, “Scenarios” and “Accuracy”.	Explains that NIFM is indicative, not property-specific; HEFS assumes a 30% increase in peak flows; detailed/site-specific assessment may be required.
R24	Applicant Appendix 4-3 – Drainage Drawings Drainage drawing set accompanying the EIAR.	Contextual source for the project drainage design and drainage features; not relied upon as a substitute for the Location 17-specific hydraulic information requested in the observation.
R25	An Coimisiún Pleanála – Case PAX21.324561 Official case record for the proposed Crumhach Wind Farm.	Primary planning-case record and source of the applicant documentation referenced above.

Appendix index

Appendix A: Observer property folio – closeup (Map 1)

Appendix B: Historical adjoining folio/right-of-way map (Map 2)

Appendix C: OPW Floodinfo.ie – Dromore West flood mapping (High-end Future Scenario)

Appendix D: Applicant Autotrack – Turbine Delivery Route, Location 17

Appendix E: Observer photographs- actual flooding/high-water conditions at Location 17 (2024)

Appendix F: Existing stone-built drainage culvert

Appendix G: Existing electricity and telecommunications poles and blade/load swept path at Location 17

Appendix A – Observer property folio (closeup)

Observer supplied cadastral screenshot. Red shading identifies the observer's folio; yellow identifies adjoining land stated by the observer to have been obtained by SSE for the current project.



Appendix B – Historical adjoining folio / right-of-way map

Observer supplied cadastral screenshot showing the wider adjoining folio/right-of-way arrangement associated with the previous windfarm development.



Appendix C – OPW Floodinfo.ie: Dromore West flood mapping

Observer supplied screenshot from OPW Floodinfo.ie showing the Dromore West area with National Indicative Mapping – High-end Future Scenario active.

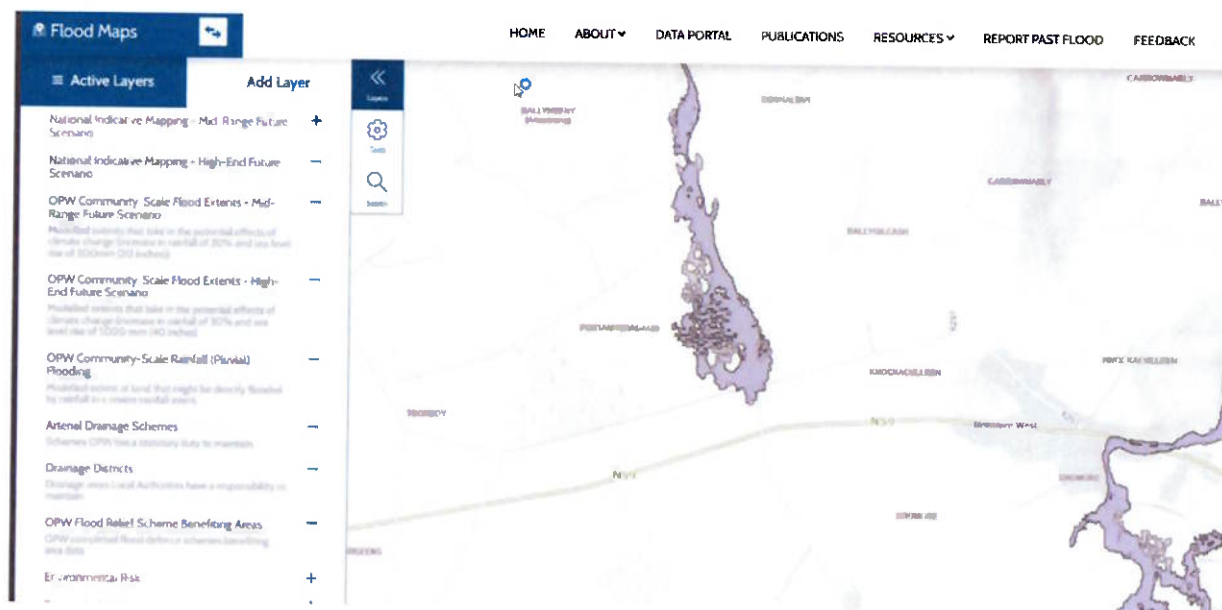


Figure C1. OPW Floodinfo.ie – Dromore West area, High-end Future Scenario.

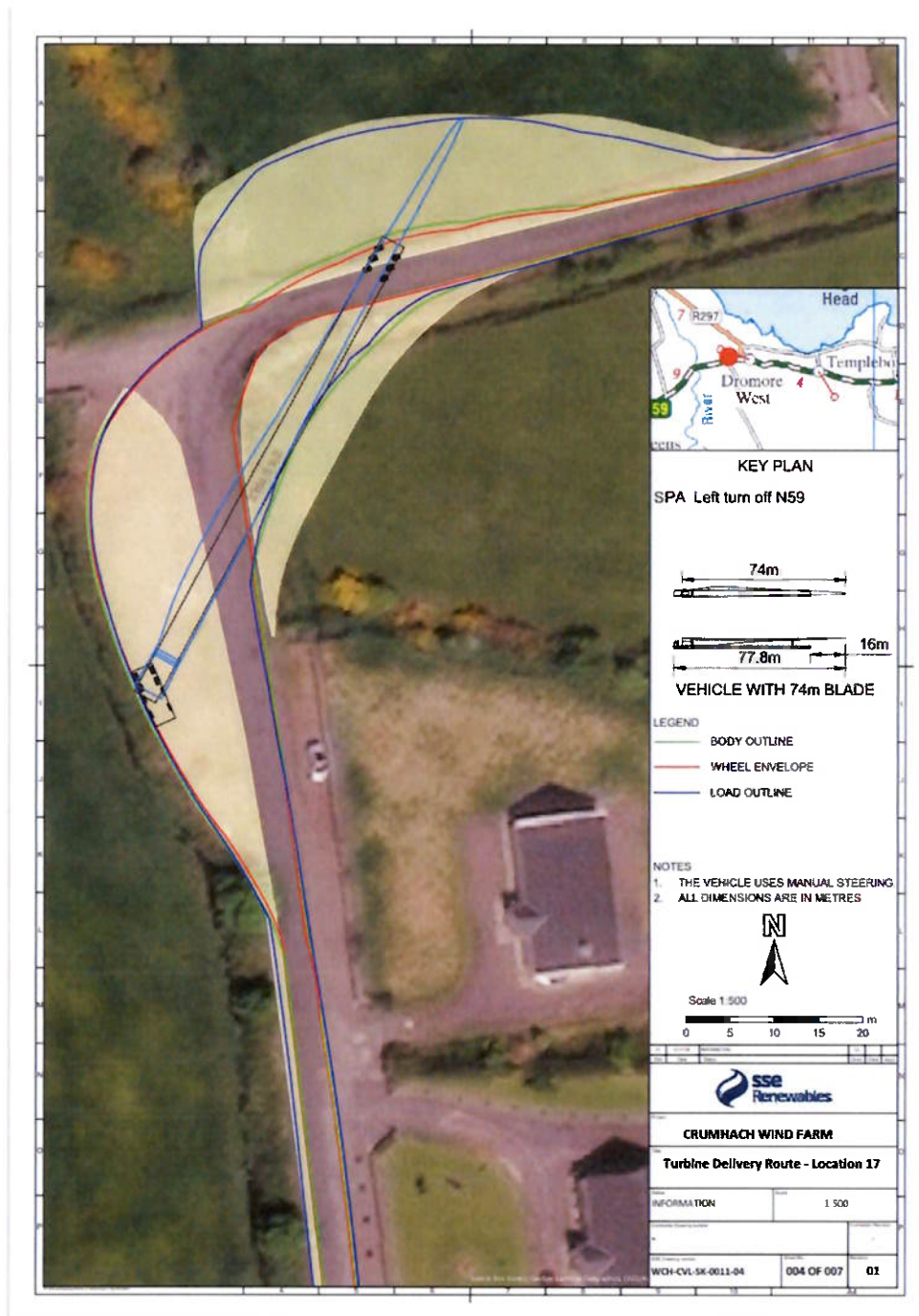
Important qualification. This mapping is included as contextual evidence of flood susceptibility in the wider locality. It is not presented as proof that the observer's individual property lies within a mapped flood extent. OPW guidance states that National Indicative Fluvial Maps are indicative/strategic and should not replace a detailed site-specific flood risk assessment.

Relevance to Location 17. The mapping reinforces the request for a Location 17-specific hydraulic assessment of the existing roadside drain before the proposed overrun hardstand preparation, temporary runover area, vegetation clearance or any associated changes to verge/ground levels are undertaken. The assessment should demonstrate that the works will not reduce drainage capacity, impede flood conveyance or redirect runoff towards the adjoining dwelling.

OPW guidance: The High-end Future Scenario for National Indicative Fluvial Mapping allows for a 30% increase in peak flows. OPW advises that the maps may identify where further flood risk assessment is required but are not property specific determinations.

Appendix D – Applicant Autotrack drawing: Location 17

Applicant drawing WCH-CVL-SK-0011-04, Sheet 004 of 007 – Turbine Delivery Route, Location 17.



Appendix E Observer photographs: 2024 flooding/high-water conditions at Location 17

The following photographs were supplied by the observer and are stated to have been taken during periods of heavy rainfall in 2024. They show actual high-water/flood conditions in the immediate Location 17 area. In particular, they show water in the field beside the observer's boundary wall and substantial water within/around the drainage area directly across the road beside the proposed turbine delivery swept path/overrun works.

Purpose and limitation. These photographs document observed site conditions; they do not by themselves establish flood frequency, depth, return period, or prove that the proposed development will worsen flooding. Their relevance is that they provide site-specific evidence that the area can experience significant high-water conditions and therefore support the request for a detailed hydraulic assessment before the Location 17 accommodation works are undertaken.



Figure E1. 2024 high-water/flood conditions photographed from the observer's boundary wall, looking into the adjoining field beside the hedgerow identified by the observer as proposed for removal.



Figure E2. 2024 high-water/flood conditions in the field immediately adjoining the observer's boundary and the Location 17 area.



Figure E3. 2024 high flow in the existing drainage channel directly across the road from the observer's property, beside the proposed Location 17 sweep/overrun area.



Figure E4. 2024 flooding/high water directly across the road from the observer's property, adjacent to the proposed Location 17 swept path/overrun works.



Figure E5. Additional 2024 photograph showing substantial standing/high water in Location 17 locality during heavy rainfall.



Figure E6. Approximate locations of the 2024 flooding/high-water photographs shown in Figures E1–E5.

The aerial image above has been annotated by the observer to indicate the approximate locations from which the photographs in Figures E1–E5 were taken. The annotations are included to assist in understanding the relationship between the photographed high-water/flood conditions, the observer's property and the immediate Location 17 area. They are illustrative only and are not survey-grade.

Arrow 1 – Figure E1

Arrow 2 – Figure E2

Arrow 3 – Figure E3

Arrow 4 – Figure E4

Arrow 5 – Figure E5

Appendix F – Existing stone-built drainage culvert

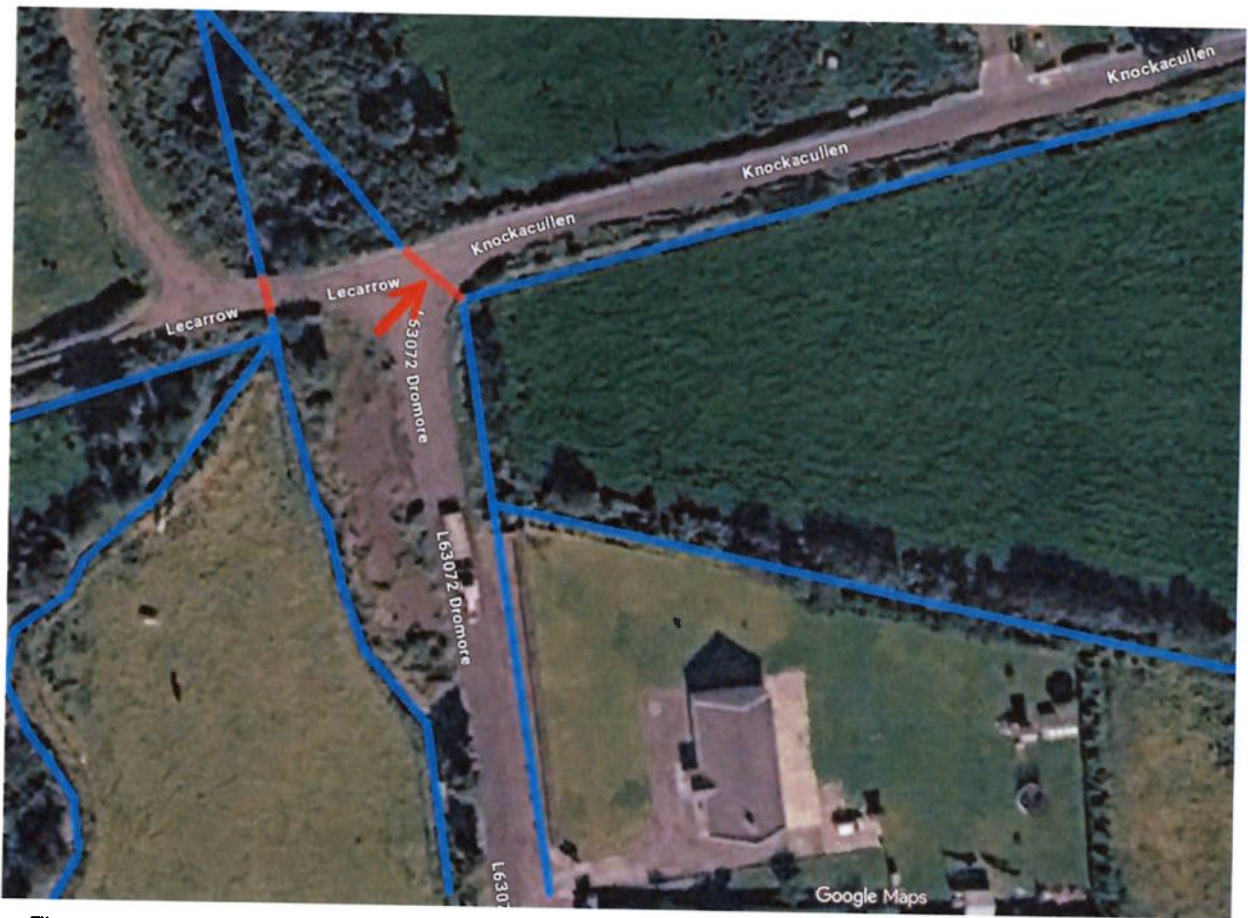


Figure F1 – Aerial image annotated by the observer to show the approximate locations of existing drains and culverts at Location 17

Note: The blue lines have been added by the observer to indicate the approximate routes of existing open drains/streams observed in the immediate Location 17 area. The red markings indicate the approximate locations of existing culverts carrying water beneath the public road. The red arrow identifies the existing stone-built culvert beneath the road at/adjacent to Location 17 over which abnormal-load traffic is expected to pass. The second red marking identifies the approximate location of another culvert at the adjoining road crossing/bridge.

The annotations are illustrative only and are not relied upon as establishing the precise alignment, dimensions, levels or construction of the drainage features shown.

The Applicant's Location 17 Autotrack drawing shows the wheel, body and load envelopes for the proposed turbine delivery vehicle but does not identify the existing stone culvert shown approximately by the observer on this image. The Applicant's Autotrack documentation does, however, expressly identify a "STONE CULVET" at another turbine-delivery-route location (Location 19).

Appendix G - Existing electricity and telecommunications poles and blade/load swept path at Location 17

This appendix illustrates the existing roadside utility poles and overhead services beside the turbine delivery route at Location 17 and their approximate relationship with the Applicant's Appendix 15-3 Autotrack swept-path drawing. The photographs show electricity and telecommunications infrastructure along the route and at the bend. The pole positions marked on Figure G3 are approximate, based on visual comparison with the Street View imagery, and are not survey-grade. They are included to identify an apparent potential conflict requiring survey and clarification by the Applicant, not as proof of the precise position of any pole.



Figure G1. Street View imagery showing the sequence of existing roadside utility poles and overhead services along the approach to Location 17. The imagery is used to establish the presence and general roadside position of the utility infrastructure.



Figure G2. Street View imagery at the Location 17 bend. The overhead electricity line can be seen running between the roadside poles. The upper-bend electricity pole forms part of the connection serving the observer's dwelling, with the line continuing towards the pole beside the property. The right-hand roadside pole is identified by the observer as telecommunications infrastructure.

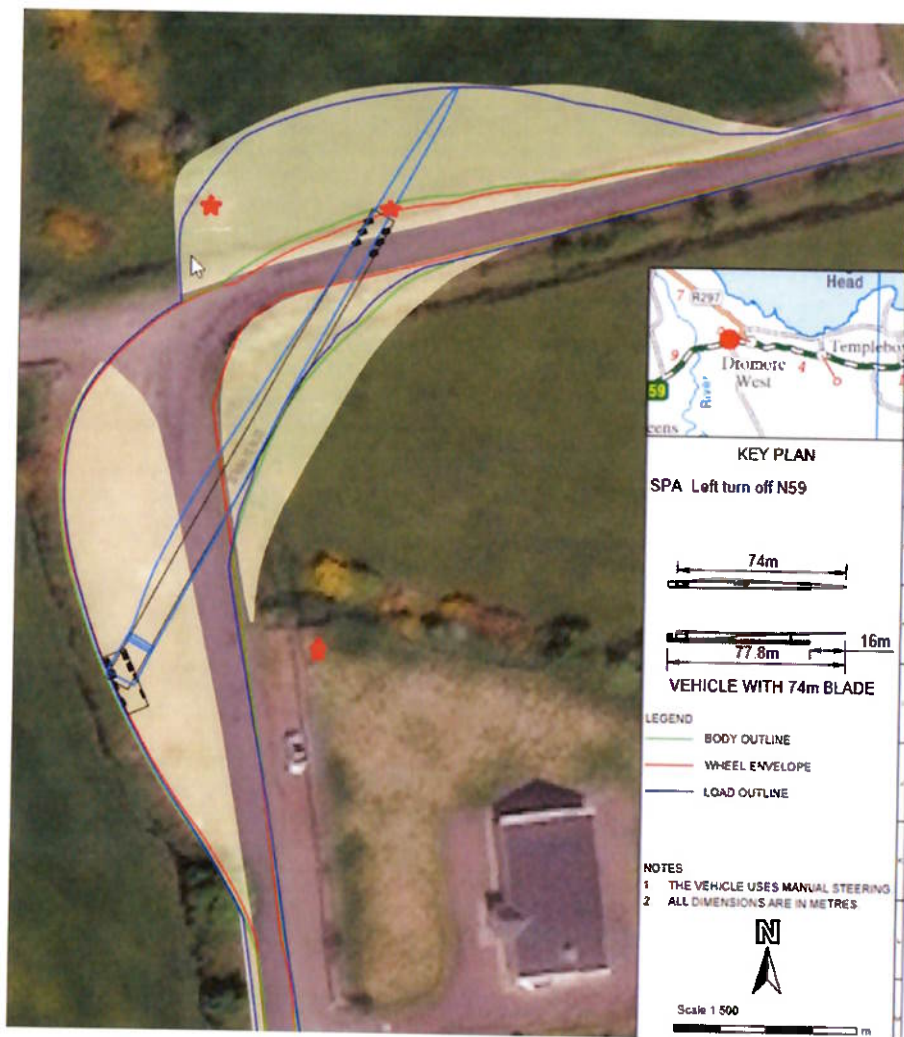


Figure G3. Observer's illustrative annotation of the Applicant's Appendix 15-3 Location 17 Autotrack drawing. Red markers indicate the approximate positions of the visible roadside utility poles identified from the Street View imagery, including electricity infrastructure and the telecommunications pole on the right-hand side of the road. These positions are illustrative only and are not survey-grade.

Purpose of Comparison

The illustrative comparison indicates a potential conflict between existing roadside utility infrastructure and the Applicant's blade/load swept envelope. Because the observer-added pole positions are approximate and are not survey-grade, this appendix does not assert that a collision or interference has been established. It illustrates why the survey-grade assessment requested in Section 12A is required.

Source note: Figures G1 and G2 are Google Street View screenshots supplied by the observer (imagery marked 2024). Figure G3 reproduces the Applicant's Appendix 15-3 Location 17 Autotrack drawing with observer-added approximate utility-pole markers.