Lauren Murphy

From: Bernard Greene <bgreene@leitrimcoco.ie>
Sent: Friday 16 October 2026 13:04
To: Communications
Cc: Dympna Reilly; Liam Flynn; Mary Quinn; SIDS
Subject: ACP-324597-26 - FuturEnergy Lissinagroagh Designated Activity Company (DAC) -
Attachments: LCC Submission - Lissinagroagh Windfarm - 110 kv Sub Station and Grid Connection Route.pdf

Follow Up Flag: Follow up
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Categories: Lauren

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A chara,

I refer to your notification dated 27 August 2026 with respect to the submission of an application for consent to the Commission by FuturEnergy Lissinagroagh Designated Activity Company (DAC) under the provisions of 182A(1) of the Planning & Development Act 2000, as amended.

In response, please find attached the report which sets out the position of the Planning Authority as requested.

Kind regards,

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Comhairle Chontae Liatroma
Leitrim County Council

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Comhairle Chontae Liatroma
Leitrim County Council

Submission from Leitrim County Council Planning Authority

FuturEnergy Lissinagroagh Designated Activity Company (DAC)

Proposed 110 kV Substation and 110 kV Grid Connection Route

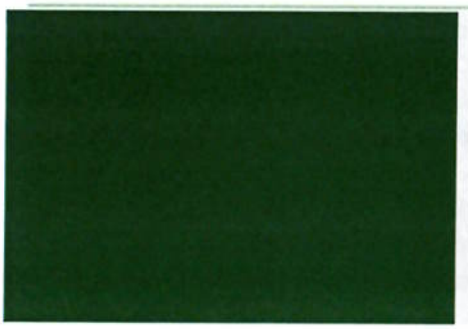
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Comhairle Chontae Liatroma | Leitrim County Council	**Leitrim County Council Planning Report**
Planning Reference No:	ACP-324597-26
Applicant:	FuturEnergy Lissinagroagh Designated Activity Company (DAC)
Location:	The 110 kV substation is located in the townland of Faughary, Co. Leitrim. The Grid Connection Route is located in the townlands of Curraghfore, Skreeny, Faughary, Amorset, Clooneen, Milltown, Cornastauk, Srabrick, Cloonaquin, Carrigeencor, Boihy, Aghameelta, Kilcoosy, Corrudda, Cleen, Tully, Killeen, Killanummery, Cleighran, Fawn, Drumahaire, Drumlease, and Carrowcrin, Co. Leitrim, and in the townlands of and Lavally, Drumee, and Ballysumaghan, Co. Sligo
Application Type:	Strategic Infrastructure Development Application under Section 182(A) of the Planning and Development Act 2000, as amended.
Proposed Development	• A permanent 110 kV on-site electrical substation located on the proposed Lissinagroagh Wind Farm site (which is subject of a separate planning application lodged to An Coimisiún Pleanála on 14/05/2026 (ACP-324290-26)), including the following: – An EirGrid control building; – An Independent Power Producer (IPP) control building; – All electrical plant and infrastructure and grid ancillary services equipment; – A telecommunications mast (ranging up to 23m in height with 2.3m below ground level); – Car parking spaces for up to 10 vehicles; – Lighting; – Security fencing; – 2 no. wastewater holding tanks; – Rainwater harvesting equipment; – All associated infrastructure and services including site works and signage. • A Grid Connection Route consisting of a 110 kV underground cable which is approximately 32 km in length (of which 30.6 km will be in the public road corridor), which will be installed from the 110 kV substation to the existing ESBN Srananagh Substation, Co. Sligo. The Grid Connection Route will also consist of the following works: – 11 no. bridge crossings, of which 8 no. will involve in-road HDD (Horizontal Directional Drill), 2 no. will involve off-road



HDD and 1 no. will be a standard crossing within the bridge deck;
- 8 no. culvert crossings by open trenching; and
- All related site works and ancillary development

The on-site Substation and Grid Connection Route subject of this planning application will remain permanent infrastructure and will form part of the national grid network.

Please note that a separate application to obtain approval for the proposed windfarm was submitted separately to An Coimisiún Pleanála in May 2026 (Ref. ACP-324290-26). The proposed Lissinagroagh Wind Farm application seeks approval for a 14-turbine wind farm and all associated infrastructure, including a meteorological mast, 3 borrow pits, temporary construction compounds and works to facilitate a Turbine Delivery Route including a temporary road crossing and 7 no. permanent controlled access points. The current application, and the proposed windfarm application are functionally interdependent and constitute a single project. Notwithstanding separate consent application processes, the entirety of the development has been considered in the submitted Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS).

1. Introduction

An application for permission for the proposed development was submitted directly to An Coimisiún Pleanála under section 182(A)(1) of the Planning and Development Act 2000, as amended (hereafter referred to as 'the Act'). An Coimisiún Pleanála notified the Planning Authority of the receipt of this application in correspondence dated 27th August 2026, which was received by hard copy the following day, 28th August 2026.

The Planning Authority was requested to make the application documentation available for public inspection / purchase at our offices in accordance with the terms of the public notice. The Planning Authority received 2 no. hard copies of the complete application documentation along with a number of electronic copies. One hard copy was retained in the Planning Authority offices in Carrick-on-Shannon with the second hard copy placed on public display in Manorhamilton library having regard to the location of the proposed development. The application was also available to view electronically from the Commission's own website and a link to same was placed on our own website. The applicants also have all of the submitted documentation available on a dedicated website.

The Planning Authority have been invited to make a submission to the proposed development, which submission must be received by the Commission, no later than 16th October 2026. The letter outlines that An Coimisiún Pleanála advises that it expects that the Planning Authority submission on this application will cover, where relevant, the following range of issues:

- Main relevant Development Plan provisions relating to the subject site and surrounding area. A clear indication of the current status of the relevant Development Plan and any draft Plans should be given, together with any relevant issues arising. Details of other relevant Plan provisions (e.g. Local Area Plans) and statement regarding status of these Plans (adopted or in draft form).
- Relevant planning history relating to the subject site and the surrounding area.
- Relevant national, regional and local policies.
- Any Special Area Amenity Order which may be affected by the proposed development.

- European designations, National Heritage Areas, which may be affected by the proposed development (whether in or proximate to same).
- Protected Structures, Architectural Conservation Areas, etc.
- Availability and capacity of public surface water drainage facilities and any history of flooding relevant to the site.
- Assessment of landscape status and visual impact, as appropriate.
- Carrying capacity and safety of road network serving the proposed development.
- Environmental carrying capacity of the subject site and surrounding area, and the likely significant impact arising from the proposed development, if carried out.
- Planning Authority view in relation to the decision to be made by the Commission.
- Planning Authority view on community gain conditions which may be appropriate.
- Details of relevant section 48/49 Development Contribution Scheme conditions which should be attached.
- Details of any special contribution conditions which should be attached along with detailed calculations and justification for the conditions.

It is anticipated that the Planning Authority submission will include the views/recommendations of all relevant departments in the Local Authority as well as the Planning Authority's overall considered view on the proposal.

2. Overview of Proposed Development

The proposed grid connection and 110 kV substation the subject of this planning application will connect the proposed Lissinagroagh Wind Farm to the national electricity transmission grid. The Grid Connection Route (GCR) is an underground cable which will run from the proposed onsite 110 kV substation at the wind farm to Ballysumaghan, Co. Sligo, where it will connect to the existing Srananagh 220 kV substation.

The proposed 110 kV substation is located in the western portion of lands associated with the Lissinagroagh Wind Farm application site, adjacent to the L61801 access in the townland of Faughary.

The proposed GCR is approximately 32 km in length, of which 30.6 km will be in the public road corridor. The remainder is located within Coillte lands and other private lands, with a short section located within the proposed Lissinagroagh Wind Farm site itself. The cover page listed the various townlands in Co. Leitrim and Co. Sligo in which the proposed GCR would be located in.

The location of the proposed development is shown in Figure 1 overleaf.

The on-site 110 kV electrical substation will be located within a compound with a total area of 11,600 m^2 secured by a 2.6m high palisade fence, to transform and transmit the electricity generated by the turbines to the proposed grid connection at Srananagh 220 kV substation. The substation compound will contain an EirGrid control building containing a battery room, control room, generator room, worker welfare facilities, toilet amenities and equipment store (450 m^2); an Independent Power Producer (IPP) control building containing a switch gear room, a control room, a site office, store rooms and toilet amenities (220 m^2); and other ancillary electrical, plant, infrastructure and grid equipment. The substation will also include parking, lighting, security fencing, a wastewater holding tank and all other associated infrastructure including site works and signage.

The IPP building will also contain offices and welfare facilities for staff, including toilet facilities which will be installed with a low-flush cistern and low-flow wash basin. It is proposed to manage wastewater from the staff welfare facilities in the control buildings by means of sealed storage tanks, with all wastewater being tankered

off-site by a permitted waste collector to a suitable wastewater treatment plant. It is not proposed to treat wastewater on-site. The collection period for the tank will be agreed with the permitted waste collector on installation, and it is estimated that this will be carried out every 6 months. The tank will be fitted with an automated alarm system that will provide sufficient notice that the tank requires emptying. The wastewater storage tank alarm will be integrated with the on-site electrical equipment for alarm notification that will be monitored remotely 24 hours a day, 7 days per week.

The proposed GCR utilises the existing public road network where possible prioritizing the use of local and regional roads to reduce likely significant effects on the environment. There are 2 bridge locations where the cable will extend off road onto private lands to facilitate Horizontal Directional Drilling (HDD) beneath the River Bonet. The private lands are generally pastoral agriculture.

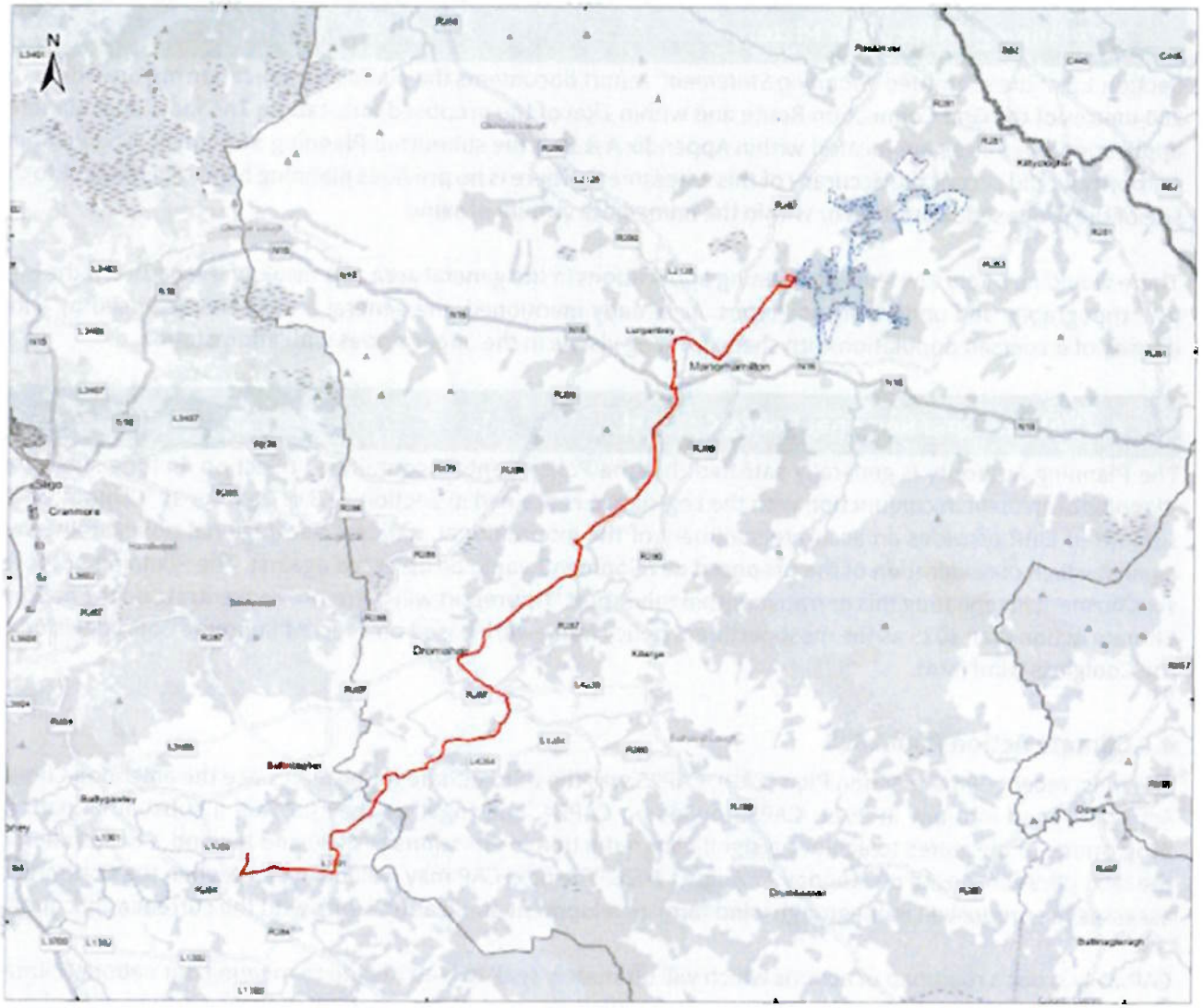


Figure 1: Application Site Boundary

The on-site 10 kV substation will connect to the turbines (subject of the previously submitted Lissinagroagh Wind Farm application) by underground MV cables. Fibreoptic cables will also connect each turbine to the turbine control system located within the substation control building included as part of the 110 kV substation application. The electrical and fibre-optic cables running from the turbines to the onsite substation compound

will be run in cable ducts approximately 1 m below the ground surface within the proposed internal tracks and/or their verges or within clear span bridge decks where a watercourse is required to be crossed.

The proposed 110kV substation is located within lower ground in comparison to parts of the proposed wind farm site. It is situated within an existing woodland setting on lands owned by Coillte CGA and approximately 100 metres from the local roadway at its nearest point. The land use activities within the site of the proposed substation are commercial forestry. The area surrounding the application site can be described as rural with a dispersed settlement type.

The application site is adjacent to the L61801 local road. The local road is linked to a network of existing Coillte and private forestry tracks, which provide good coverage and are maintained in a variable condition.

3. Planning Application History

Section 1.3 of the submitted '*Planning Statement*' report documents the planning application history within the 200 metres of the Grid Connection Route and within 1km of the proposed Substation. The individual planning application references are located within Appendix A & B of the submitted Planning Statement. The Planning Authority would accept the accuracy of this assessment. There is no previous planning history in relation to the site of the proposed substation or within the immediate vicinity of same.

There would be a very low level of planning applications in the general area as a result of the nature of the land use, topography and underlying soil types. As already mentioned, the general area is characterised by a low density of dispersed population with sheep farming visible in the upper slopes with afforestation.

4. National and Regional Policy Context

The Planning Authority is generally satisfied that the Policy Context contained in Section 4 of the submitted *Planning Statement* in conjunction with the Legislative contained in Section 12.3 of Chapter 12 '*Climate*' of the submitted EIAR provides an accurate summary of the international, national and regional policy framework against which consideration of the proposed development would be assessed against. The Planning Authority sees no merit in repeating this narrative within this report. This report will therefore concentrate on the national Climate Action Plan 2025 as the most pertinent policy framework based on a recent Supreme Court decision on the Coolglass wind farm.

4.1 Climate Action Plan 2025

The most recent Climate Action Plan (CAP), CAP25 was the third update to the plan since the amended Climate Act was signed into law in 2021. CAP25 builds on CAP24, and together they provide a substantial national programme of measures to achieve a significant reduction in emissions to 2030 and beyond. Consultation on the next iteration closed on Monday 17 August 2026. The next CAP may well be in place when the Commission assesses the proposed Lissinagroagh wind farm development application along with the current application.

CAP 25 lays out a roadmap of actions which will ultimately seek to lead Ireland to meeting our national climate objective of pursuing and achieving, by no later than the end of the year 2050, the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy. It aligns with the legally binding economy-wide carbon budgets and sectoral emissions ceilings that were agreed by Government in July 2022.

CAP25 reaffirms Ireland's commitment to transforming the electricity sector through a major expansion of renewable energy, with wind energy remaining the cornerstone of the strategy. The Planning and Development Act 2024 (as amended), the Renewable Energy Directive III and the revised National Planning Framework together will ensure greater alignment between national, regional, and local authority levels to deliver on the renewable electricity ambition.

Key relevant Wind Energy Provisions in CAP25:

1. Onshore Wind Expansion
   - CAP25 maintains the target of 9 GW of installed onshore wind capacity by 2030.
   - Onshore wind is expected to provide a substantial share of the renewable electricity needed to achieve Ireland's target of 80% renewable electricity by 2030.
   - Continued support is provided through planning reform, grid development and renewable electricity support schemes.
   - Lifetime extensions and repowering at existing sites will be critical to ensuring that the 80% renewable electricity target is reached.

2. Offshore Wind Development
   - Ireland retains its target of at least 8 GW of offshore wind capacity by 2030.
   - CAP25 identifies offshore wind as critical for decarbonising electricity generation and enhancing energy security.
   - Priority actions include:
     - Progressing offshore wind projects through planning and consenting processes.
     - Developing offshore transmission infrastructure.
     - Expanding port capacity to support construction and maintenance activities.
     - Advancing future offshore renewable energy auctions

3. Grid Infrastructure and Transmission
   - CAP25 recognises that achieving wind energy targets depends on significant upgrades to the national electricity grid.
   - The Plan supports:
     - Reinforcement of the transmission network.
     - Delivery of major grid projects by EirGrid and ESB Networks.
     - Increased grid capacity to connect new onshore and offshore wind farms.
     - Enhanced interconnection with neighbouring markets.

4. Renewable Electricity Target
   - The Plan continues Ireland's objective of reaching 80% renewable electricity generation by 2030, with wind expected to provide the largest contribution.
   - Wind generation already supplies a significant proportion of electricity demand, with CAP25 noting that wind generated almost 40% of Ireland's electricity in the first half of 2024.

5. Planning and Consenting Reform
- CAP25 supports reforms to accelerate renewable energy development, including:
  - Alignment of the planning system with climate objectives.
  - Implementation of provisions under the revised National Planning Framework.
  - Faster consent processes for renewable energy projects while maintaining environmental safeguards.

6. Renewable Electricity Support Scheme (RESS)
- The Plan continues the use of competitive auctions and support mechanisms to bring forward additional wind energy projects.
- RESS remains a key tool for attracting investment in both onshore and offshore wind developments.

7. Energy Security and Economic Benefits
- CAP25 highlights wind energy's role in:
    - Reducing dependence on imported fossil fuels.
    - Improving national energy security.
    - Lowering electricity-sector emissions.
    - Supporting regional economic development and employment.

In summary, CAP25 is primarily focused on delivering 9 GW of onshore wind and at least 8 GW of offshore wind by 2030, supported by accelerated planning processes, major grid investment, offshore infrastructure development, and renewable energy auctions. Wind power is expected to be the single most important technology in achieving Ireland's target of 80% renewable electricity by 2030 and meeting national climate obligations.

4.2 Conclusion

The Planning Authority would be satisfied that the principle of the proposed development is supported by the national and regional planning policy framework for renewable energy development. The proposed wind farm is also compatible with European, national and local climate change and renewable energy policy and legislation. Consequently, the Planning Authority considers that the principle of the use of the site for the purposes of wind energy generation which would include the proposed 110 kV substation and associated grid connection to be an acceptable and sustainable use of the land from such a policy framework perspective.

5. Local Policy Context

5.1 Leitrim County Development Plan 2023-2029

This section provides a summary of the main provisions of the County Development Plan which are considered to be of particular relevance in the consideration of the submitted wind farm development and the associated 110 kV substation and GCR. Whilst the Planning Authority are in the process of making Variation No. 1 to the County Development Plan 2023-2029 which will be completed at a special meeting of the Council on Monday 16th November 2026, it does not have any material effect on the proposed development. The Planning Authority provided a similar comprehensive summary in our submission for the Lissinagroagh Wind Farm application.

Section 2.2 – *Vision and Strategic Aims* sets out a range of strategic aims and complementary strategic objectives for the sustainable development of the county, including "*development that addresses climate change in terms of adaptation and mitigation measures including increasing flood resilience, the promotion of sustainable transport options and the development of renewable energy technologies where possible to achieve a successful transition to a low carbon economy*".

Section 4 – *Economic Development* – sets out the policy framework for the economic development of the county across a number of sectors including tourism, rural-based enterprise and employment, infrastructural and renewable energy.

Section 9 – *Infrastructure and Energy* – sets out the policy framework aimed at supporting and further developing the physical infrastructure within the county across a number of services such as water supply, wastewater, surface water and flood alleviation infrastructure, telecommunications and energy supply, including infrastructure associated with renewable energy development.

This includes Energy Networks Infrastructure whereby the development of secure and reliable electricity transmission infrastructure is recognised as a key factor in supporting economic development and attracting investment to an area.

The following policy is of relevance:

ENI POL 2 To co-operate and liaise with statutory and other energy providers in relation to power generation in order to ensure that the energy needs of future population and economic expansion within designated growth areas and across the wider region can be delivered in a sustainable and timely manner, which minimises impacts on environmental sensitive and high visual quality areas and that capacity is available at local and regional scale to meet future needs.

This section also deals with *Water Quality* in Section 9.5. The section outlines that Leitrim County Council has an important role to play in the protection, maintenance and improvement of water quality through the planning and management of future development.

The following policies and objectives are of relevance:

WQ POL 1 To protect existing groundwater sources and aquifers in the county and to manage development in a manner consistent with the protection of these resources.

WQ POL 2 To support the preparation of Drinking Water Protection Plans and Source Protection Plans to protect sources of public water supply, in accordance with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, the Council supports mitigation and protection measures for all protected areas, including Drinking Water Protected Areas.

WQ POL 9 To permit new development only in instances where it has been demonstrated to the satisfaction of Irish Water that there is sufficient capacity (in compliance with the Water Framework Directive and River Basin Management Plan) for appropriate collection, treatment and disposal of wastewater to cater for the anticipated loading arising from the proposed development.

WQ POL 10 To assess proposals for development in terms of their impact on human health to include, inter alia, the potential impact on existing adjacent developments, on existing land uses and/or the surrounding landscape. Where proposed developments would be likely to have a significant adverse effect on the amenities of the area through pollution by noise, fumes, odours, dust, grit or vibration, or cause pollution of air, water and/or soil, mitigation measures shall be introduced in order to eliminate adverse environmental impacts or reduce them to an acceptable operating level.

WQ OBJ 2 To achieve our targets of attaining and maintaining a minimum of '*good status*' in all water bodies in compliance with the Water Framework Directive and to co-operate with the implementation of the National River Basin Management Plan 2018-2021, and subsequent replacement plans. This includes contributing towards the protection of Blue Dot catchments and drinking water resources whilst having cognisance of the EU's Common Implementation Strategy Guidance Documents No. 20 and 36 which provide guidance on exemptions to the environmental objectives of the Water Framework Directive.

WQ OBJ 4 To ensure that development will not have an unacceptable adverse impact on water quality including surface water, ground water, designated source protection areas, river corridors and associated wetlands.

Flood Risk Management is also contained within this section of the Development Plan.

FRM POL 2 To ensure that a flood risk assessment is carried out for any development proposal, in accordance with the Planning System and Flood Risk Management (DoEHLG/OPW 2009) and Circular PL2/2014. This assessment shall be appropriate to the scale and nature of risk to the potential development.

FRM POL 9 To ensure that in assessing applications for developments, that consideration is had to the impact on the quality of surface waters having regard to targets and measures set out in the River Basin Management Plan for Ireland 2018-2021 and any subsequent local or regional plans.

FRM POL 10 Development proposals will need to be accompanied by a Development Management Justification Test when required by the Guidelines. Where only a small proportion of a site is at risk of flooding, the sequential approach shall be applied in site planning, in order to seek to ensure that no encroachment onto or loss of the flood plain occurs and/or that only water compatible development such as 'Open Space' would be permitted for the lands which are identified as being at risk of flooding within that site.

Section 10 – *Rural Development* – addresses a number of rural-based economy sectors including agriculture, forestry, extractive industries, and renewable energy.

Section 11 – *Heritage & Biodiversity* – addresses the built, cultural and heritage assets of the county and sets out the policy framework for the protection and sustainable management of such assets. This section also references two separate plans, the Leitrim Heritage Plan 2020-2025 and the Leitrim Biodiversity Action Plan 2022-2027. Please note that both of these plans remain effective with the replacement Leitrim Heritage Plan 2025-2030 due to be approved in September.

Section 11 also addresses and provides policy content in relation to various land cover types within the county such as wetlands, woodlands/forestry areas and peatlands. Moreover, **Section 11.13 – *Landscape*** provides the policy framework for the conservation of landscape character areas, designated sensitive landscape and protected views and prospects. Related to this section, the assessment of the proposed development shall also have regard to the contents of the following appendices to the Leitrim County Development Plan 2023-2029: **Appendix VII – County Leitrim Landscape Character Assessment; Appendix VIII – County Leitrim Landscape Designations and Appendix IX – County Leitrim Views and Prospects**, which inform the policy framework provided in Section 11.13 of the Plan.

- sensitivities of the county's landscapes.
- visual impact on protected views, prospects, designated landscapes, as well as local visual impacts.
- impacts on nature conservation designations, archaeological areas, county geological sites, historic structures, public rights of way and walking routes.
- local environmental impacts, including those on residential properties, such as noise and shadow flicker.
- visual and environmental impacts of associated development, such as access roads, plant and grid connections from the proposed wind farm to the electricity transmission network.
- scale, size and layout of the project and any cumulative effects due to other projects.
- the impact of the proposed development on protected bird and mammal species.

WE POL 6 To have regard to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to '*Wind Energy Development*' and the DCCAE Code of Practice for Wind Energy Development in Ireland and any other relevant guidance which may be issued.

WE OBJ 1 To secure the maximum potential from the wind energy resources of Co. Leitrim commensurate with supporting development that is consistent with proper planning and sustainable development of the area.

Section 13 – Development Management Standards sets out the general Development Management principles and standards that will be applied by the Council to ensure that future development is in accordance with the policies and objectives set out elsewhere in the Plan. Development Management Standards specific to energy, telecommunications and services, including wind energy development, are set out in Section 13.20.

The Standards reiterate that when assessing planning applications for wind energy development, the Planning Authority shall have regard to national guidance and the policy framework provided in Section 12 of Volume I - Written Statement and Appendix X of the Plan.

In addition, the following considerations will be taken into account by the Planning Authority in relation to any planning application for wind energy development:

- Impact on the visual amenities of the area.
- Impact on the residential amenities of the area.
- Scale and layout of the project, any cumulative effects due to other projects and the extent to which the impacts are visible across the local landscape.
- Visual impact of the proposal with respect to protected views, scenic routes and designated scenic landscapes.
- Impact on nature conservation, water quality, ecology, including an assessment of impacts on collision risk species (birds and bats), soil, hydrology, groundwater, air quality, archaeology, built heritage and public rights of way.
- Impact on ground conditions and geology.
- Impact on peat stability and robust geotechnical assessment of potential for peat slippage.
- Consideration of falling distance plus an additional flashover distance from wind turbines to overhead transmission lines.
- Impact of development on the road network in the area.
- Impact on human health in relation to:

- Noise disturbance (including consistency with the Word Health Organisations 2018 Environmental Noise Guidelines for the European Region).
- Shadow flicker (for wind turbine developments, including detailed Shadow Flicker Study).

This list is not exhaustive, and the Planning Authority may consider other requirements in relation to traffic and transport assessments, road safety audits/road safety impact assessments, access onto public roads, haul route assessment etc. Section 13 sets out development management standards in relation to such items.

Section 13.20.4 of the Plan outlines the Development Management Standards relating to the undergrounding of cables. Proposals should demonstrate that environmental impacts including the following are minimised:

- Habitat loss as a result of removal of field boundaries and hedgerows (right of way preparation) followed by topsoil stripping (to ensure machinery does not destroy soil structure and drainage properties).
- Short to medium term impacts on the landscape where, for example, hedgerows are encountered.
- Impacts on underground archaeology.
- Impacts on soil structure and drainage.
- Impacts on surface waters as a result of sedimentation.

Conclusion
In general, the Leitrim County Development Plan 2023-2029 endorses the national and regional policies in terms of renewable energy. The Leitrim County Development Plan 2023-2029 contains a number of policies and objectives aimed at mitigating and adapting to the effects of climate change. This includes policies and objectives relating in support of suitable and sustainable renewable energy developments, including wind energy development, as informed by the *Leitrim County Renewable Energy Strategy* and its companion document *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* which together form Appendix X of the Plan. Specifically, RE OBJ 1 seeks to achieve a minimum of 200 MW of renewable electricity in the county by 2030, by facilitating renewable energy developments including micro-generation renewable technologies incorporating solar, wind, hydro-electric and bioenergy.

Set within the aforementioned policy context and noting the location of the subject site within an area where there is identified potential for wind energy development and having regard to the presence of some limited capacity for such development in the general area of the subject site, it is considered that the general principle of the proposed development is acceptable to the Planning Authority. However, the suitability is predicated on other planning and environmental considerations being satisfied along with due consideration of the visual and landscape assessment of the scale of the 110 kV substation now proposed. It is not considered that such visual and landscape factors relate to the proposed GCR.

5.2 Leitrim Climate Action Plan 2024-2029

In line with Section 14B of the Climate Action and Low Carbon Development Act 2015, as amended, and the Local Authority Climate Action Plan Guidelines; Leitrim County Council adopted the Leitrim County Council Local Authority Climate Action Plan 2024-2029 by resolution at a full plenary Council meeting on 19 February 2024.

The vision of the Climate Action Plan is aligned to the Government's National Climate Objective which seeks to achieve the transition to a climate resilient, biod450450iversity rich, environmentally sustainable and climate neutral economy by 2050. The Climate Action and Low Carbon Development (Amendment) Act 2021 frames Ireland's legally binding climate ambition to deliver a reduction in greenhouse gas emissions by 51% by 2030.

County Leitrim Landscape Character Assessment

In the case of this subject application, the proposed site of the 110 kV substation is located within Landscape Character Type 7 (Upland Farmlands and Foothills). Considered of more significance, it is located in Character Area (LCA) 4 – Arroo and Mountain Outliers. LCA 4 is described *as "a large mountain complex which rises above Lough Melvin, Glenade and Lough MacNean Upper. It has contrasting elements of moorland plateaus, moorland hills and farmed slopes. The area is dominated by Arroo Mountain, which rises to 523m AOD. Other summits include Sheenun, Dough Mountain and Thur Mountain reaching 421, 462 and 410 m AOD respectively These summits are separated from each other by high, remote, settled valleys. The range and quality of habitats and the variety of rare species has resulted in Arroo Mountain being designated as a Special Area of Conservation and proposed Natural Heritage Area and along with Ben Bulben has been called the botanically richest mountain in Ireland. The moorland plateaus associated with these mountains is remote and relatively inaccessible although appreciated visually from the valleys below and lowland areas further south. Field pattern is generally absent at the higher elevations. On lower slopes, field pattern is defined by hedgerows and in some cases post and wire fencing. The screening effect of hedgerows and woodlands creates more intimate landscapes."*

On Dough and Thur Mountains, sandstone and shale predominate, creating smoother profiles and a gentler plateaus landscape. Rocky streams draining off the sodden hills have cut narrow valleys. Waterfalls tend to be found where streams cross harder layers. Fowley's Falls, a series of cascades on Glenaniff River are one of the best known of these features. The lower hill slopes and valleys are more gently sloping and shelve gradually into the drumlin farmland, glens and loughs which fringe the upland. Aughty Series peat soils occupy the moorland plateaus and hills. On the lower slopes, there are gley soils originating from the underlying bedrock.

The land cover of Dough and Thur mountains feature large tracts of commercial coniferous forestry in regular blocks of uniform age on large proportions of the moorland hill slopes and lower gentle farmed slopes. These tend to mask the underlying features and varied terrain which are crucial in the appreciation of the landscape.

With regard to landscape quality, condition and sensitivity of LCA 4, the County Leitrim Landscape Assessment states

> *"The upland part of this landscape, comprised of mountain moorland, features remote, wild, windswept and relatively undeveloped areas which have a particular unique scenic quality.*
>
> *This landscape is generally considered to be in good condition albeit with some signs of dereliction in the lowland farmed areas where post and wire fences have replaced hedgerows. Wind turbines in the vicinity of Saddle Hill confer a developed character to this particular area which affects the underlying landscape character. The extensive and largely inaccessible plateaus are generally in good condition although overgrazing and peat extraction threatens delicate and sensitive habitats. The condition and true character of the landscape around Dough Mountain is considerably undermined by extensive commercial coniferous forestry. This has eroded the key landcover characteristics such as vegetation patterns and field boundaries.*
>
> *The landscape is valued as recognised in the County Designations and the valued and sensitive attributes documented above.*
>
> *The areas of moorland plateaus are particularly sensitive to change owing to the distinctive character of the mountain skylines, scenic quality, wilderness like quality and visual openness. These landscapes present as distinctive skylines and landmarks viewed from much of the surrounding lowlands. They are sensitive to changes which would interfere with important unique skyline views available from the lowlands."*

With respect to *Forces for Change* currently visible in the landscape in addition to commercial forestry plantations in the vicinity of Dough Mountain and Saddle Hill, the LCA states:

> *"Areas of search for wind turbines have been identified within this LCA according to the Leitrim Renewable Energy Strategy indicating potential for future development in the form of additional wind farms and single wind turbines. This would need to have regard to the sensitive upland landscapes and cliff slopes together with the adjacent lowlands including Lough Melvin and Glenade Valley."*

Finally, with respect to Conservation Objectives, specific recommendations, in addition to the need to conserve sensitive and valued landscape attributes identified above, the LCA states:

- Traditional stone wall boundaries and hedgerow boundaries are preferable to post and wire fences;
- Manage peat extraction and other activities to conserve the moorland and mountain habitats. Maintain ecological value of habitats by establishment of a sustainable grazing regime on the mountains;
- Retention of open areas of mountain moorland, heath and grassland. Retain views to and from these mountain skylines and lowland farmland; and
- Management and control of invasive alien plant species (IAPS).

County Leitrim Landscape Designations

The County Development Plan 2023-2029 identified designated areas of landscape (Appendix VII), distinguishing between Areas of Outstanding Natural Beauty (AONB) and Areas of High Visual Amenity (AHVA).

> **AONB** (Area of Outstanding Natural Beauty) – A landscape of outstanding natural beauty attributed largely to natural characteristics such as landform, vegetation cover and habitat, geological features, scarcity or absence of development or man-made built elements and areas of wilderness.
>
> **AHVA** (Area of High Visual Amenity) – A landscape of high visual amenity owing to a range of factors including natural, cultural and man-made influences.

There are no Special Amenity Area Orders in Co. Leitrim.

B3 Dough Mountain encompasses most of the application site of the proposed wind farm application. The area is shown by the black dashed line in Figure 2 overleaf. However, the site of the proposed 110 kV substation is located outside B3 Dough Mountain by over 400 metres.

The Key Characteristics are stated as follows:

> *The moorland plateau associated with the summit of this mountain (above the 450m contour) is a remote and visually open area due to the scarcity of woodland vegetation. The main landcover is bog and there is very little built development thereby conferring a sense of wildness to this area. The summit of the mountain presents an important scenic skyline as backdrop to the surrounding valleys. The visual openness of this landscape facilitates long range dramatic views towards adjacent mountain ranges. The landscape is rural and remote with high levels of tranquillity away from roads.*
>
> *The landscape below the 450m contour features extensive plantation coniferous forestry which is a detracting element. The presence of an extensive network of small roads within the commercial plantation forestry and also wind turbines are detracting elements which undermine the scenic quality as purpose of the designation.*

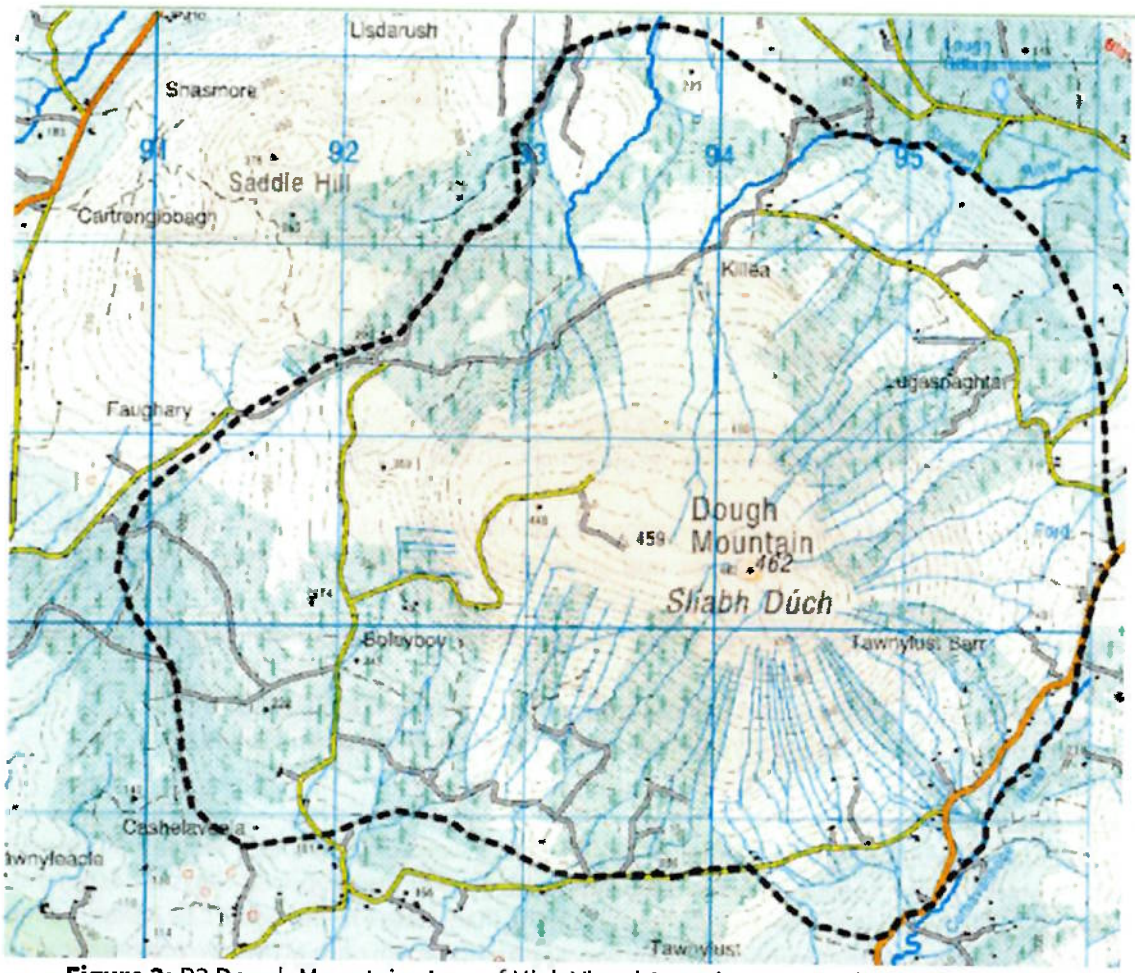


Figure 2: B3 Dough Mountain, Area of High Visual Amenity – Appendix VIII County Leitrim Landscape Designations

Section 4.6.4 provides the recommendation of the Landscape Designation:

Whilst the assessment indicates that panoramic views are attained of the surrounding landscape from the summit, there is a locked field gate which prevents access to the summit. Dough mountain has a rounded profile which is recognisable and confers a sense of place to the surrounding local area. A sense of remoteness and tranquillity is experienced away from minor roads, wind turbines on Saddle Hill and plantation coniferous forest.

The designation of this area stands due to its key characteristics, in particular, the mountain summit and surrounding elevated areas with the outlook towards adjacent hills and valley landscapes. Despite the detracting influence of the wind turbines on Saddle Hill and plantation coniferous forest on the lower slopes which have partially altered the character of the landscape, the boundary of the AHVA remains in recognition of the skyline of the mountain summit which is deserving of protection.

The Special Qualities and Statement of Importance in section 5.2.3 is as follows:

Dough Mountain is an upland landscape with a smooth rounded mountain skyline which overlooks the valley landscape to the south presenting a recognisable skyline and conferring a sense of place on the local area.

Visitors at elevated locations can enjoy panoramic views of the adjacent hills and lowlands. The mountain summit and surrounding elevated areas features a landcover of peat bog and is generally remote and tranquil. The importance of this landscape and hence its inclusion in an AHVA designation is attributed to the following special qualities:

- *Mountain moorland landscape at higher elevations is remote and tranquil away from minor roads;*
- *Panoramic views of the valley landscapes and surrounding hills from elevated locations;*
- *Moorland landscape features naturally occurring peat bog landcover; and*
- *High levels of tranquillity and sense of remoteness away from settlements and roads and wind turbines on the adjacent Saddle Hill.*

AHVA B4 Thur Mountain is located to the east of the R282 linking Manorhamilton to Rossinver. The importance of this landscape and hence its inclusion in an AHVA designation is attributed to the following special qualities:

- Mountain moorland landscape at higher elevations is remote and tranquil away from minor roads;
- Panoramic views of the valley landscapes and surrounding hills, including Dough Mountain from elevated locations;
- Moorland landscape features naturally occurring peat bog landcover throughout along with small areas of heathland;
- Cullentragh Lough is a naturally occurring lake in the upland moorland landscape; and
- High levels of tranquillity and sense of remoteness away from settlements and roads.

County Leitrim Views and Prospects

Appendix IX of the County Development Plan contains '*County Leitrim Views and Prospects*' which are protected in the plan. The statement on the special qualities associated with each of the proposed views is documented along with a photograph of the view. The County Development Plan states in *Section 11.16.1 Development Management* that the landscape of the county has many vantage points which offer attractive panoramic views of high-quality landscapes. These scenic views are of amenity and tourism value and contribute to our quality of life. It is not envisaged that the designation of a protected view would prohibit all development within the view, rather any development proposed within the view should be designed and located so as not to obstruct the view or be unduly intrusive in the landscape as seen from these vantage points.

Landscape Policies and Objectives

The relevant policies and objectives contained in the County Development Plan in relation to *Landscape* are as follows:

LCA POL 1	To conserve and enhance the high nature conservation value of the Landscape Character Areas in order to create/protect ecologically resilient and varied landscapes.
LCA POL 2	To protect, enhance and contribute to the physical, visual and scenic character of Co. Leitrim and to preserve its unique landscape character.
LCA POL 3	To ensure that landscape sensitivity and the preservation of the uniqueness of a landscape character area (where appropriate) is an important consideration in determining the appropriateness of development uses and proposals in areas of landscape sensitivity, (scenery, nature conservation or archaeology) in conjunction with the siting, design and materials proposed.

LCA POL 4 To seek to ensure that local landscape features, including historic features and buildings, hedgerows, shelter belts and stone walls, are retained, protected and enhanced where appropriate, so as to preserve the local landscape and character of an area, whilst providing for future development.

LCA POL 5 To require that landscape and visual impact assessments prepared by suitably qualified professionals be submitted with planning applications for development which may have significant impact on landscape character areas of medium or high sensitivity.

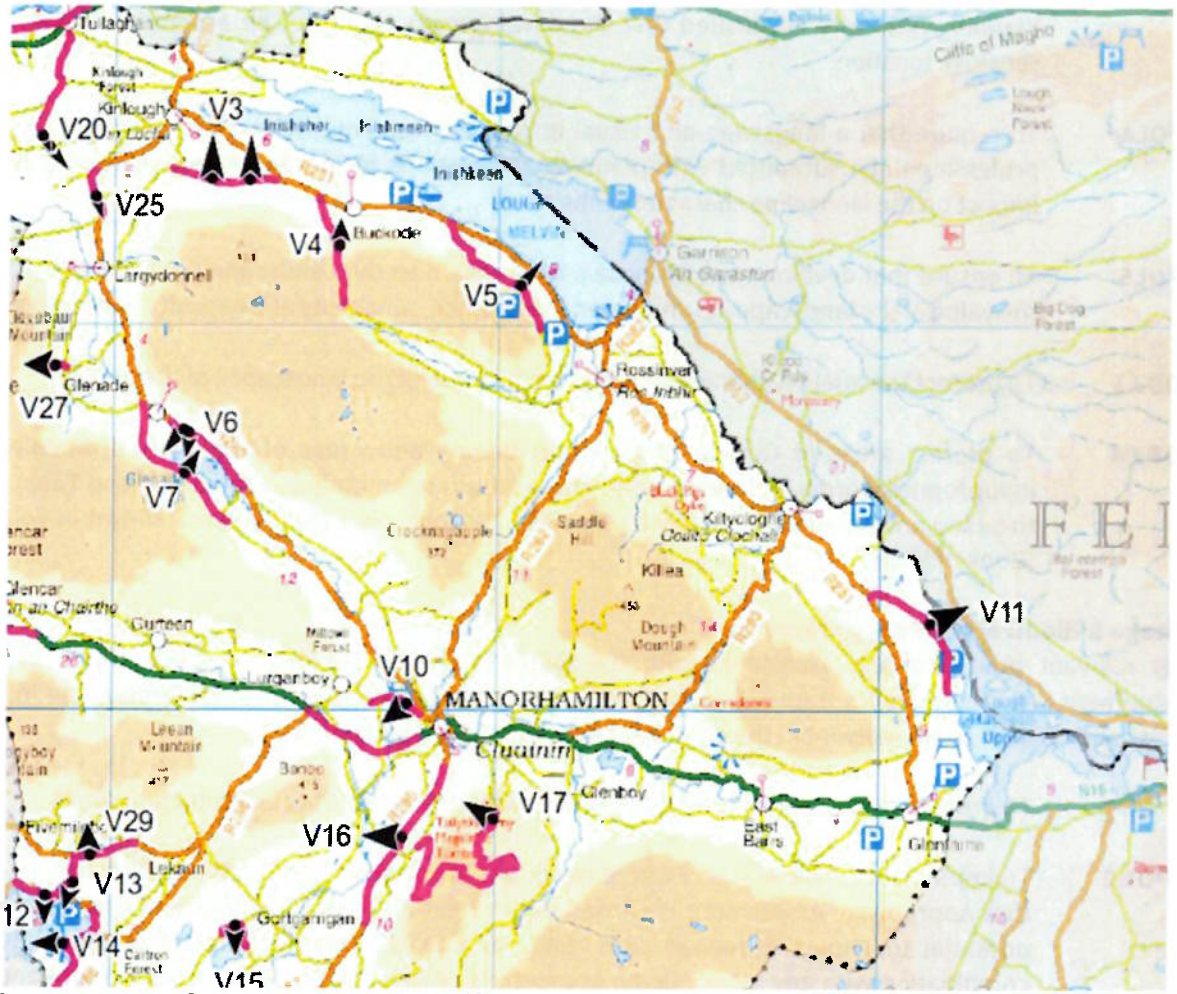


Figure 3: Extract from Map 11: Protected Views and Prospects, Volume III Book of Maps, CDP 2023-2029

LCA OBJ 1 To protect and enhance the quality, character, and distinctiveness of the physical, visual and scenic character of landscapes of the county in accordance with national policy and guidelines and the recommendations of the Leitrim Landscape Character Assessment (2020) which forms Appendix VII of this Plan.

LCA OBJ 2 To ensure that the management of development will have regard to the value of the landscape, its character, importance, sensitivity and capacity to absorb change as outlined in Appendix VII of this Plan - Leitrim Landscape Character Assessment (2020) and its recommendations.

LD POL 1 To safeguard the protected views and prospects contained in Table 11.8 and identified on Map No. 11 (Volume III - Book of Maps) from intrusive development which would interfere unduly with the character and visual amenity of the landscape.

LD POL 2 To protect areas of Outstanding Natural Beauty and Areas of High Visual Amenity from inappropriate development and reinforce their character, distinctiveness and sense of place.

LD POL3 To permit development in an area of High Visual Amenity only where the applicant has demonstrated a very high standard of site selection site layout and design and where the Planning Authority is satisfied that the development could not be accommodated in a less sensitive location.

LD POL4 To require that a landscape and visual impact assessment, prepared by a suitably qualified professional, be submitted with planning applications for development which may have an impact on the landscape character of the area.

LD POL5 To ensure that development proposals have regard to the Landscape Character Assessment, the value of the landscape, its character, importance, sensitivity and capacity to absorb change.

LD OBJ 1 To protect the quality, character and distinctiveness of the landscapes of the county.

LD OBJ 4 To protect areas of Outstanding Natural Beauty and Areas of High Visual Amenity from inappropriate forms of development. These areas are identified in Table 11.6 and Table 11.7 of this plan and shown graphically on Map No. 10 '*Landscape Designations*' shown in Volume III (Book of Maps).

Heritage & Biodiversity Policy Framework

Other relevant policy context associated with the Leitrim CDP 2023-2029 in respect of the proposed development include the policy framework outlined in **Chapter 11 – Heritage & Biodiversity**. The following policies and objectives are relevant in the context of the proposed development:

NH POL 1 To protect and conserve Special Areas of Conservation and Special Protection Areas.

NH POL 2 To implement Article 6(3) and where necessary Article 6(4) of the Habitats Directive, to ensure that Appropriate Assessment is carried out in relation to works, plans and projects with the potential to impact European sites (SACs and SPAs), whether directly or indirectly or in combination with any other plan(s) or project(s). All assessments must be in compliance with the European Communities (Birds and Natural Habitats) Regulations 2011, as amended, and the Planning and Development Act 2000, as amended as relevant.

NH POL 3 To protect designated Natural Heritage Area (NHA) sites, including proposed Natural Heritage Area sites (pNHA) and seek to develop linkages between designated sites and other non-designated sites of ecological importance, where feasible and as resources permit.

NH POL 4 To consult with relevant prescribed bodies, such as the National Parks and Wildlife Service (DoHLGH), and take account of any licensing requirements when undertaking, approving and authorising development which is likely to affect plant, animal or bird species or habitats protected by law.

NH POL 5	To ensure that development does not have a significant adverse impact on plant, animal or bird species or habitats protected by law, subject to satisfactory mitigation measures.
NH POL 6	To protect and where possible enhance wildlife habitats and landscape features which act as ecological corridors/networks and stepping stones, such as river corridors, hedgerows and road verges, and to minimise the loss of habitats and features of the wider countryside (such as ponds, wetlands and trees) which are not within designated sites.
NH POL 7	To treat the uplands of North Leitrim located above the 160 metre contour, as an ecologically-sensitive entity, where these uplands are not already designated as such.
NH POL 8	To protect ecological networks linking protected and designated important sites within the county, in accordance with Article 10 of the *Habitats Directive*.
NH POL 9	Biodiversity: To ensure that appropriate mitigation and/or compensation measures... are required where habitats are at risk or lost as part of a development.
NH POL 10	To ensure the protection, conservation and enhancement of the biodiversity of the county.
NH OBJ 1	To ensure that no project or programme giving rise to significant adverse, direct, indirect, secondary or cumulative impacts on the integrity of any Natura 2000 site(s), having regard to their qualifying interests and conservation objectives, arising from their size, scale, area or land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either alone or in combination with other plans or projects)[1].
NH OBJ 2	To protect and conserve those sites designated as Special Areas of Conservation (SACs) during the lifetime of this Plan. The list of current SACs is contained in Table 11.1 of this Chapter.
NH OBJ 3	To protect and conserve those sites designated as Special Protection Areas during the lifetime of this Plan. There is current one SPA in Co. Leitrim which is contained in Table 11.2 of this Chapter.
NH OBJ 4	To protect and conserve Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) that become designated and notified to the Local Authority during the lifetime of this Plan. The list of current NHAs and proposed NHAs are contained in Table 11.3 and 11.4 of this Chapter.
NH OBJ 5	To protect the character, appearance and quality of the habitats and semi-natural features in Co. Leitrim such as woodlands, hedgerows, peatlands, wetlands and artificial waterways of historic or ecological importance.
AGI POL 2:	To protect County Geological Sites from inappropriate development.

[1] Except as provided for in Article 6(4) of the Habitats Directive which states that there must be: a) no alternative solution available, b) imperative reasons of overriding public interest for the project to proceed; and c) Adequate compensatory measures in place.

PEAT POL 1 To conserve peatlands and protect peatland landscapes within the county.

PEAT POL 2 To seek hydrological reports for significant developments within and close to peatlands, to assess potential impacts on the integrity of the peatland ecosystems.

TWH POL 1: To discourage felling of healthy mature trees and encourage retention within developments to the maximum extent practicable.

TWH POL 2: To require planting of native broadleaved species and species of local provenance in new developments as appropriate.

TWH POL 3: To support schemes and initiatives that establish/enhance woodlands for recreational and wildlife benefits.

TWH POL 4: To protect and preserve existing hedgerows and minimise their removal; where removal is necessary, seek replacement with new native hedgerow material.

IS POL 1 To require relevant development proposals to address the presence or absence of invasive alien species on proposed development sites and (if necessary) require applicants to prepare and submit an Invasive Species Management Plan where such a species exists to comply with the provisions of the European Communities (Birds and Natural Habitats) Regulations 2011-2015 and the EU Regulation on Invasive Alien Species 1143/2014.

ARCH POL 1 To secure the preservation (i.e. preservation in-situ or in particular circumstances where the Council is satisfied that this is not possible, preservation by record as a minimum) of all archaeological remains and sites of importance such as National Monuments, Recorded Monuments, protected wrecks and underwater archaeological heritage, to include their setting and context.

ARCH OBJ 2 To ensure that any development (above or below ground or underwater), within the vicinity of a site of archaeological interest or protected wreck or area of underwater archaeological heritage shall not be detrimental to the archaeological remains, character of the site or its setting.

ARCH OBJ 3 To require, where appropriate, that an archaeological assessment or underwater archaeological impact assessment be carried out by a suitably qualified person prior to the commencement of any activity that may impact upon archaeological heritage, including underwater archaeological heritage.

Section 12 – Climate Action & Renewable Energy – addresses the various policy instruments associated with this development theme and sets out the various climate action measures, underpinned by a series of policies and objectives, aimed at mitigating and adapting to the effects of climate change. This includes policies and objectives relating to the renewable energy developments as informed by ***Leitrim County Renewable Energy Strategy*** and its companion document ***Landscape and Visual Capacity Study for Wind Farms and Wind Turbines*** which together form **Appendix X** of the Plan.

A number of overarching policies and objectives in relation to climate action mitigation and adaptation, including renewable energy development, are provided in Section 12 of the Plan, with the following policies and objectives considered to be of relevance in relation to the proposed development:

CA POL 1 To support the implementation of the European, national, regional and local objectives for climate adaptation and mitigation detailed in Section 12.2.2 and Section 12.2.3 of this Plan.

CA POL 2 To support the transition of the county towards a competitive, low carbon, climate-resilient and environmentally sustainable economy by 2050 by providing for consolidated development forms which facilitate the reduction of energy demand and greenhouse gas (GHG) emissions, and which supports sustainable travel patterns in line with the Core Strategy.

RE POL 1 To encourage and facilitate the production of energy from renewable sources, such as from wind, solar, bioenergy, hydroelectricity, and geothermal, subject to compliance with proper planning and environmental considerations.

RE POL 2 To promote and support developments and actions that assist in achieving the national targets for energy from renewable resources and reducing greenhouse gas emissions associated with energy production.

RE POL 3 To ensure environmental assessments for new energy developments should address reasonable alternatives for location. Where existing infrastructural assets such as sub-stations, powerlines and roads already exist within proposed development areas, then such assets should be considered for sustainable use by the proposed development where the assets have capacity to absorb the new development.

RE OBJ 1 To seek to achieve a minimum of 200 MW of renewable electricity in the county by 2030, by facilitating renewable energy developments, including micro-generation renewable technologies incorporating solar, wind, hydro-electric and bioenergy.

Leitrim County Renewable Energy Strategy

To facilitate the sustainable growth of renewable energy technologies within the county, the *Leitrim County Renewable Energy Strategy* (RES) was prepared as part of the Plan and is included in Appendix X. The RES was prepared with the overall aim of the strategy to provide a plan led approach to renewable energy development in Co. Leitrim. Whilst the Renewable Energy Strategy was considered of significance to the proposed wind farm development, it is not considered of the same significance to the subject development which is considered development ancillary to the windfarm. The subject development is therefore considered dependent on the substantive wind farm development being approved and being proceeded with. It is not considered necessary to replicate the narrative from the Chief Executive's report to the wind farm development application in this regard.

Section 12.6.2 of the County Development Plan directly relates to Wind Energy generation. It acknowledges that the Climate Action Plan (2019) included a target to expand onshore wind energy generation to 8,200 MW by 2030 (approximately doubling current installed capacity which sits at around 4,000 MW). An assessment of Leitrim's potential contribution to this target (up to 2030) is set out in Table 12.2 (see Figure 7) and corresponds with the estimated wind capacity / potential presented in the accompanying RES. The RES has identified the potential for Leitrim to increase its wind energy operational capacity by 90% in the period up to 2030, through

a combination of repowering and extending existing wind farms and new wind farms. This aligns well with the national target for growth in onshore wind energy.

The Plan acknowledges that the figures provided do not represent a '*ceiling*' or '*cap*' on the potential of renewable energy that can be generated in the county up to 2030. The figures provided are seen as practicable and achievable targets for the county over this period. Moreover, the Plan notes the provisions of Action 102 of the Climate Action Plan 2021 which includes an objective to develop a new spatial policy for large scale wind and solar development, in support of the target to increase the share of electricity demand generated from renewable sources to up to 80% and that this will be implemented through a regional planning initiative. When implemented, this will give counties like Leitrim the platform to review and if necessary, revise upward the renewable electricity targets contained in this Plan. The updates to this Climate Action Plan and the National Planning Framework review will be dealt with in the next section.

This section emphasises that *"site suitability is an important factor in determining the suitability of wind farms, having regard to possible adverse impacts associated with, for example, residential amenities, landscape, including views and scenic routes, wildlife, habitats, designated sites, protected structures or bird migration paths, and compatibility with adjoining land uses. The Council is required to achieve a reasonable balance between responding to overall positive Government policy on renewable energy and enabling the wind energy resources of the county to be harnessed in a manner that is consistent with proper planning and sustainable development."*

Existing Connected Wind Energy (2021)	92 MW
Additional indicative/ potential capacity included in the RES up to 2030.	83 MW (90% increase of existing)
Total 2030 Operational	175 MW

Figure 4: Co. Leitrim Wind Energy Target Potential to 2030 (Table 12.3 County Development Plan 2023-2029 Volume I Written Statement)

The following policies and objective from the Plan relate to wind energy development proposals:

WE POL 1 To acknowledge the importance of wind energy in Co. Leitrim as a renewable energy source which can play a vital role in achieving national targets in relation to reductions in fossil fuel dependency and therefore greenhouse gas emissions.

WE POL 2 To encourage the development of wind energy in suitable locations and in an environmentally sustainable manner to ensure the security of energy supply, in accordance with Government policy and the Leitrim County Renewable Energy Strategy.

WE POL 3 To ensure that the assessment of wind energy development proposals will have regard to the following:

Leitrim County Council Climate Action Plan aims to enhance climate resilience, increase energy efficiency, and reduce greenhouse gas emissions, across Leitrim County Council's own assets, services, and infrastructure, whilst also demonstrating a broader role of inspiring, leading and facilitating other sectors, to meet their own climate targets and ambitions.

The Plan provides that Leitrim County Council supports development of renewable energy generation in accordance with the *Renewable Energy Strategy* and the development of a secure and renewable energy infrastructure that can contribute to national electricity grid decarbonisation targets and to support community-based renewable energy projects. This will include focusing on opportunities such as

- Support the development of renewable electricity generation in accordance with national and local policies.

The Actions on Sustainability & Resources Management include a series of objectives and actions to achieve same. One objective is to "*Support renewable electricity generation, transmission and use within the County in line with national and regional policy including the Electricity Storage Policy Framework*".

This includes Mitigation Action No. SR23

> *Renewable Electricity to be developed in accordance with Leitrim County Council's Renewable Energy Strategy (RES) and the National Renewable Electricity Spatial Policy Framework, to support sustainable development of renewable electricity. Promote the proper planning and sustainable development of renewable energy and ancillary grid infrastructure.*

Mitigation Action No. SR24

> *Support safe, secure, reliable electricity grid infrastructure within the County to support renewable electricity generation, reinforcement, strengthening and integration of the transmission network to allow linkages with renewable electricity proposal consistent with RES. Promote the proper planning and sustainable development of renewable energy and ancillary grid infrastructure.*

6. Consideration of Alternatives

The report submitted to the Commission on behalf of the Planning Authority with respect to the wind farm development application considered this matter in detail and the Planning Authority would refer the Commission to this report in this regard. The Planning Authority considered the totality of the project to include the proposed 110 kV substation and GCR in that element of the previous report.

The submitted EIAR outlined that alternative substation locations were also considered, with the preferred western location selected due to its flatter topography, greater separation from sensitive receptors, proximity to the principal site entrance, and more efficient connection to the selected grid route. This option was considered to represent the least environmentally constrained and most technically suitable location for the substation.

Several grid connection options were also studied. Loop-in options to the existing overhead line network were discounted due to insufficient available capacity. Several underground cable route options to the existing Srananagh substation were then assessed. Although the selected route was not the shortest available, it was

preferred because it involved fewer bridge crossings, less horizontal directional drilling, fewer environmental constraints and reduced interaction with designated ecological areas when compared to the alternative routes. It was therefore identified as the most appropriate option from both a technical and environmental perspective.

Overall, it is presented that the chosen development is the outcome of a robust alternatives assessment and iterative design process. The final proposal represents the option that best balances the efficient harnessing of the site's renewable energy resource with the avoidance and minimisation of environmental effects. The development has therefore been advanced on the basis that it constitutes the most suitable, feasible and environmentally acceptable option identified through the alternatives assessment process.

As outlined in our previous report to the Commission on the wind farm development, the Planning Authority accepts that the final submitted layout and design was the outcome of an iterative process in relation to the number and positioning of the proposed wind turbines, substation and other infrastructure, as well as the interconnecting access tracks and other required infrastructure i.e. substation, grid connection and turbine delivery route.

The Planning Authority is satisfied that the submitted chapter has clearly and sufficiently outlined the reasonable alternatives that were considered, including a '*do nothing*' alternative, and sets out the reasons for selecting the chosen option, based on consideration of the environmental effects.

7. Traffic Considerations

The Planning Authority considers that the quality of the printed hard copies of the drawings submitted with this planning application to be deficient in their quality with respect to the GCR. In relation to the submitted Overall Site Location Map, drawing 05773-U-DR-095, there are clearly layers or elements of the map which did not print off to the effect that the actual grid connection route is not shown on the submitted drawing. This is unfortunate. The digital copy of the map shows no such issues. In relation to the submitted Site Location Maps (4 no.), again the quality of the hard copies is unacceptable. The background mapping appears very faint in print and there are no annotations or roads numbers included to assist the reader. This should be compared to map (Figure 16.2 in Chapter 16 - Traffic and Transportation) of the submitted EIAR. Again, it is accepted that the background mapping appears much darker on the digital copies of the maps. However, this is of little assistance to individuals who do not have access to view the digital mapping. The only environmental receptors shown on the maps are recorded monuments which are incorrectly annotated as '*heritage monuments*'. Proximity to Natura 2000 sites have not been indicated thereon nor Protected Structures, buildings included in the NIAH, etc. The Planning Authority has had to rely on mapping submitted in Appendix 2.2 of the EIAR to identify the relevant European Sites. The Commission shall satisfy itself in relation to the adequacy of the submitted mapping but in the opinion of the Planning Authority they reflect poorly in relation to quality control.

The GCR proposes to install a 110 kV underground cable from the proposed onsite substation to the existing 220 kV Srananagh substation in Co. Sligo. The cable connection is approximately 32km in length of which approximately 30.6 km will run on the public road corridor. The remainder is located within Coillte lands and other private lands, and a short section is within the proposed wind farm site. The grid connection works will be undertaken on a rolling basis, with no more than 250m of trench open at any one time. The works will require temporary closures of sections of affected local roads and temporary lane closures on the affected regional roads, including the R282 and R280, to facilitate trenched crossings.

The trench shall be suitably backfilled at the end of the working day, with the provision of suitable temporary surfacing material, as may be requested by the Local Authority. Such closures shall only be undertaken

following consultation with the Local Authority and following any requests for notifications by the Local Authority. A Road Opening Licence shall also be applied by the principal contractor to the Local Authority.

The grid connection advanced works will have a temporary, slight, negative effect due to the temporary lane and road closure for cabling works. Once advanced works are finished, the operational effects will be imperceptible over the 35 years of operation.

The application documentation states that it is estimated that construction will commence in March 2028 and will take approximately 24 months from initial site clearance and enabling works to commissioning. It is noted that the Substation Construction and Electrical Works are indicated (Table 16.7) are being completed within 12 months.

Permanent Site Entrance 1 (Faughary Td.) will use an existing forestry site entrance on the L61801 which will be modified. The L61801 is a local road located directly to the west of the proposed project. The carriageway is approximately 4 metres wide in the vicinity of the site. This road connects the site of the proposed wind farm to Manorhamilton via the R282 Rossinver Regional Road. It branches off to form the L61802 which provides access to Faughary Wind Farm. This is the access from which the substation will be constructed.

Section 4.5 of the submitted Traffic Management Plan indicates that during grid connection cabling works on the relevant road network, a diversion route for traffic will be implemented. This shall be approved by Leitrim and Sligo County Council following consultation with the Road Authority, An Garda Síochána and other emergency services. The maximum length of the active traffic management area (i.e., including taper lengths) shall be no more than 500 metres in length for any proposed shuttle system. To minimise traffic delays, it is outlined that it may be necessary to limit the works site to shorter lengths if queuing delays are encountered. A desktop study has been carried out of the roads likely to be affected by the Grid Connection Route. It was determined that feasible diversion routes are available along the route. However, the appointed contractor will be required to liaise with both County Councils to agree on the most suitable diversion routes, if required.

There are no considerations required with regard to decommissioning of the proposed project noting that the substation will form part of the national grid network and will be retained.

7.1 Report from Roads Authority

A report has been prepared by the Mr. Darragh O'Boyle, Senior Engineer, Sustainable Transport following discussions with Mr. Paul McMahon, Senior Executive Engineer, North Leitrim District Engineer's Office. This report is contained in Appendix I of this report but is summarised herein.

The report notes that the length of ducting within the public road network is approximately 32 km, consisting of 2.2 km of regional roads, 0.2 km of national primary and 30 km of local roads. The route traverses 11 no. road bridges, many of which are stone arch bridges of built heritage value. The Roads Department considers that the construction of the grid connection cables to the national grid, will have serious effects on the public road network although the report does not elaborate in this regard.

The Roads Department requests that the Commission in their examination of the proposed development should include consideration of the following:

- Examination of all available technologies including both Overhead Line (OHL) and Underground Cable (UGC) options (or combinations of both).

- Route options other than the routing of cables along the public road, including the use of private land agreements, to ensure the best performing route and technology option is selected.
- The public road should only be considered following a robust Multi Criteria Analysis determining the optimal solution including examining the most linear solutions.
- Examination of the use and/or upgrading existing grid connections along the route to minimise the impact on the public road.

In terms of detailed design of any cable routing impacting the public road network, without prejudice and in accordance with Department of Transport '*Interim Guidelines*',' the Roads Department would recommend a number of conditions should be included in any grant of permission that includes the laying of high voltage electricity cable in the road network where that routing is identified as the '*optimal solution*' following a robust grid connection selection process. These are outlined in the report which is attached in Appendix I.

Of particular relevance, the Roads Department considers that wherever possible, joint bay structures are best located off the carriageway in verges, open spaces, or adjacent sites; and where they must be under carriageway, joint bay structures must be constructed to accepted design standards.

The report in suggested condition no. 5 provides a table which indicates that the condition of only 3 of the 11 no. bridges proposed for the GCR are known by the Roads Authority with one of these, Cloonaquin St. Bridge having a condition rating of 1. Alert with another on the R282, Sheela More's Bridge having a condition rating of 2 – Warning. The routing of high/medium voltage transmission cables whether overhead or underground, must not impact any bridge structure in a negative way. Rating of 1-2 require Road Reconstruction which involves the full removal of existing layers of pavement, and their replacement with new structural layers of bound or sealed unbound materials along with the provision of drainage, where necessary. The Roads Authority would prefer if directional drilling is employed to avoid connection with these structures. A full joint bridge survey will need to be carried out prior to any GRC construction.

Notwithstanding, in relation to proposed works utilising the public road network, it is the Road Department's opinion that the proposed routing must be undertaken in a manner to avoid the potential to impact on future maintenance, improvement and operation of the road network in this area.

8. Impact on Residential Amenity

It is considered that noise during construction and traffic impact would be the factors most likely to cause an impact on the existing level of residential amenity enjoyed by residents in the vicinity of the proposed development. Noise is addressed in Chapter 9 of the submitted EIAR along with vibration.

The nearest dwellings (F91DH02) accessed off the L61801 to the entrance to the site is approximately 850 metres to the south west with a dwelling closer (F91AF51) at a distance of 750 metres albeit at a greater remove from the local road. In relation to construction, the assessment concluded that the majority of works would remain below the relevant construction noise thresholds. A background noise survey at selected locations along the grid connection route was carried out in 2025. The associated construction works will occur for short durations at varying distances from Noise Sensitive Locations (NSLs). For standard grid connection works, any NSL set back at 15 m or more from the proposed works is predicted to experience noise levels within the linear construction noise limit of 70 dB LAeq,1hr. NSLs located closer than 15 m to the works may experience construction noise levels slightly above 70 dB LAeq,1hr. However, due to the progressive nature of the construction methodology, it is anticipated that works will remain in close proximity to the nearest NSLs only for a limited duration. The predicted noise levels shown in Table 9-18 are expected to occur for less than two

days in a worst-case scenario, with works anticipated to progress at a rate of 100 metres per day along the route. This would conflict with the rate of progress referred to in the preceding section of this report. There are joint bay pits proposed at every 650 m – 850 m along the GCR to facilitate jointing of two lengths of cabling. It is expected that excavations for these pits will require an element of rock breaking. It is anticipated that rock breaking will only occur at each location for less than 5 days.

There are 11 no. locations where Horizontal Directional Drilling (HDD) for watercourse crossing is required to facilitate grid connection. There is no NSL within 30 m of a HDD location. At distances of 30 m and greater, the predicted construction noise levels are below the adopted significance threshold outlined in Table 9-1 (Category A – 65 dB LAeq,T during daytime periods) and the likely noise impacts are not significant. Due to the distance of the proposed works from the identified NSL's, and with reference to the discussion on vibration presented in Section 9.3.3, there will be no significant vibration impacts associated with HDD works and no specific mitigation measures are required.

Some short duration works, particularly close-range internal track construction and grid connection works, may temporarily exceed the linear works threshold at very close receptors; however, due to the progressive and short-term nature of these activities, the effects are assessed as not significant. The chapter concludes that, given the separation distances between the proposed works and nearby receptors, vibration levels are expected to remain well below thresholds associated with building damage or perceptible significant effects.

The Environment Department have previously outlined a need for clarification with regard to the location of each of the noise sensitive locations used for measurement purposes. The Commission shall satisfy itself that the submitted Noise Impact Assessment adequately assesses the likely impact on residential amenity of the nearest noise sensitive locations by reason of noise. As per the Construction and Environmental Management Plan and in order to limit noise disturbance, the Environment Department recommends that the hours of non-critical construction activity will be limited to avoid unsociable hours where possible. Construction operations will be restricted to between 07:00 hrs and 19:00 hrs Monday to Friday (excluding public holidays) and between 07:00 hrs and 14:00 hrs on Saturdays. Scheduled and planned critical construction activities (excluding emergencies) will be notified to Leitrim County Council in advance.

9. Visual Impact

9.1 Introduction

The 110 kV substation compound will be constructed to collect the generated power from the proposed wind farm project. The 110 kV on-site substation will be located in an area of existing forestry in the south-western extent of the overall wind farm site. The dimensions of the proposed substation compound will be 144m in length by 79m in width and include one control building and electrical components necessary to export generated power from the wind turbines to the transmission system. A second smaller building will be required for switching procedure with site offices and welfare facilities. The main control building will measure 18 m by 25 m and 8.85 m in height. A second smaller switchgear building will measure 20.1 m by 10.7 m, and 6.92 m in height The proposed substation compound will be surrounded by steel palisade fencing which will be 2.6m in height. The most notable construction stage landscape impacts resulting from the proposed on-site substation relate to the felling of some conifer forestry and construction of concrete foundations to facilitate the substation buildings. Overall, these construction stage effects are relatively minor. It is considered that reference within Chapter 13 to comparison to the construction of an industrial farm shed somewhat unrealistic.

Principal mitigation measures that will be implemented to make the proposed project less intrusive and less prominent at a localised level include placing the grid connection infrastructure underground. Whilst noting

the concerns previously of the Roads Department which recommends that the Commission considers above ground options, from a visual impact perspective, the Planning Authority would consider the undergrounding the more desirable option to be pursued.

I raise similar issues with respect to the planning drawings submitted in hard format for the substation as those referred to earlier in relation to the Grid Connection Route. The quality of the Substation Site Layout Plan (drawing 05773-U-DR-130) simply did not print off correctly so that all elements are actually legible. The contours are not visible at all in the printed version. They are also lost in the digital version under the stone background of the hard surface shown within the substation. It would have been expected that a drawing showing just contours would have assisted in this regard notwithstanding that the site is entirely covered with forestry.

9.2 Assessment

It is not considered that the proposed 110 kV substation, notwithstanding its scale comparable to that of a full size GAA pitch in footprint, or the GCR would have the same visual impact in comparison to that of the proposed wind turbines. The application site for the proposed 110 kV substation extends from 151 – 161 metres and will involve cut (14,231 m^3) and fill (13,591 m^3). The proposed compound level is indicated at 159.85 metres in elevation. Cross sections have been provided.

Whilst a *Landscape and Visual Capacity Study for Wind Farms and Wind Turbines* provides a robust landscape and visual capacity study to specifically evaluate the respective capacities of various landscapes in the county to potentially accommodate larger scale wind energy development proposals, it is not considered that the substation project alone would be considered in the same manner. However, conscious of the cumulative impact, it is clear that the majority of the application site of the proposed windfarm coincides primarily with areas of coniferous forestry and was largely within the area of search associated with LCA 4 Arroo and Mountain Outliers. The Planning Authority noted previously that proposed turbine no. 11 & 12 and their associated infrastructure along with the proposed 110 kV substation and compound area adjoin this area of search to the southwest.

The suitability of the proposed development therefore hinges on whether the submitted Landscape and Visual Impact Assessment has demonstrated that the that the submitted design and siting of the proposed development would not adversely impact on the landscape character and visual amenity of the wider area in which the development would be located.

The submitted Landscape & Visual Impact Assessment did not consider the localised and possibly short-term impact of the existing wooded area between the proposed substation and the local road being felled. This is part of the Coillte landholding so it is reasonable to assume as part of normal crop cycle, that this area will be harvested and replanted at some stage noting the permanence of the substation. It is considered that there is scope within the lands outside of the proposed hard surfaced area for additional landscaping to include some semi mature trees and hedging to provide additional screening to combat this inevitability.

The Planning Authority would be satisfied that the proposed siting of the 110 kV substation, subject to the retention of the existing forestry between the local roadway and provision of additional landscaping as outlined above, would not result in an adverse impact arising from a visual impact perspective. It is accepted that subject to the overall wind farm being permitted and proceeding that the substation would remain after the decommissioning of the turbines. The Planning Authority accepts that there will be some temporary landscape impacts during the construction phase including along the GCR but agrees with the submitted assessment that such impacts are modest, temporary in nature, not significant and overall, of moderate significance.

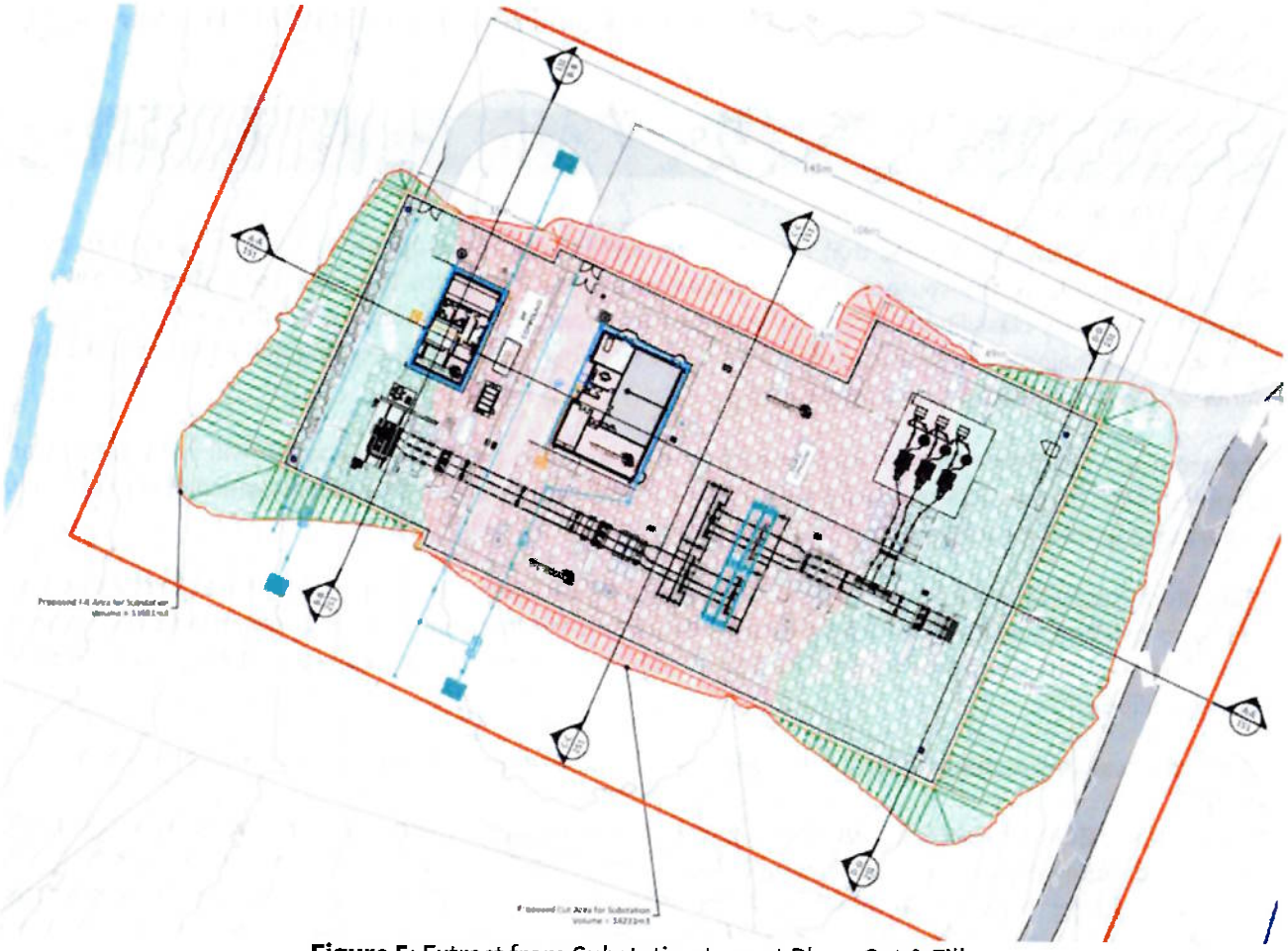


Figure 5: Extract from Substation Layout Plan - Cut & Fill

There is no view or prospect identified within the County Development Plan 2023-2029 towards Dough Mountain, Saddle Hill or Thur Mountain. All of the views and prospects identified in Figure 3 are in a direction away from the proposed wind farm development which includes the proposed 110 kV substation. There are no protected views or prospects in the immediate vicinity of the site or towards the proposed 110 kV substation. The Planning Authority does not consider therefore that the development of the proposed 110 kV substation will adversely affect any designated view or prospect in the County Development Plan 2023-2029. Whilst some of the proposed 110 kV substation may be visible from the location of a protected view or prospect identified in the County Development Plan 2023-2029, the direction of the protected view or prospect is in a different direction. The proposed development will not therefore adversely impact upon any view or prospect and is therefore compliant with LD POL 1. No further consideration of such an impact is considered necessary.

The Planning Authority has examined the character of the landscape and outlined areas of particular landscape quality, distinguishing between Areas of Outstanding Natural Beauty (AONB) and Areas of High Visual Amenity (AHVA). As outlined earlier, the site of the proposed 110 kV substation is located outside AHVA B3 Dough Mountain by over 400 metres. This includes the entrance and the initial part of the access road from the L61801 (Permanent Site Access 1) which forms part of the wind farm development consent application. It is not considered that the proposed 110 kV substation would therefore adversely impact on any designated landscape area as identified in the County Development Plan. The Planning Authority do not consider that the proposed

development would adversely impact on the preservation of the summit of Dough Mountain or of its relationship with Thur Mountain which is similarly an Area of High Visual Amenity. The Planning Authority therefore considers that the proposal would not have an unacceptable impact on the wider receiving landscape.

10. Land, Soils and Geology

10.1 Overview

The submitted assessment notes that the dominant soil type at the proposed wind farm comprises poorly drained acidic soils to the south and cutover blanket peat to the north. The soils underlying the proposed substation area are classified as deep, well-drained mineral soils corresponding to surface water gleys. The subsoils of the majority of the southern section of the site which includes the substation are dominated by till derived from Namurian sandstone and shales.

The proposed wind farm infrastructure footprint to include the proposed substation will not intercept any identified karst features, thereby avoiding potential impacts on these karst landforms which often function as important conduits for surface water recharge to the underlying aquifer system.

The soils present within the proposed wind farm application site and the GCR works areas are classified as being of low to medium sensitivity on a local scale. Peat within the footprint was previously drained for forestry, agricultural activity and turbary use. The 110 kV substation footprint is mapped as having '*Low*' landslide susceptibility.

The total excavated material to form the hardstanding for the proposed substation is stated at 4,465 m^3.

The proposed GCR is mapped as mountain ridge in the north to hill to rolling lowland bedrock ridge to drumlin and ribbed moraine topography at the southern section of the GCR. The GCR is predominantly located in the local and regional roads. The proposed works along this route are limited areas, most of which are previously disturbed ground (e.g. at the edge of road surfaces). HDD (Horizontal Directional Drilling) is proposed on the River Bonet crossing.

10.2 Dough Mountain Geological Heritage Site

The Dough Mountain geological heritage site is of scientific and educational importance and is therefore classified as a high-sensitivity receptor in this assessment. Whilst part of the proposed wind farm development intersects a small peripheral portion of the heritage site and does not require removal or alteration of key geological features or exposures, no part of the current application site of the 110 kV substation or GCR does. The overall integrity, visibility and interpretative value of the site will therefore be maintained.

10.3 Assessment

There will be a change in land use associated with the proposed wind farm project to include the construction of the proposed substation. The main impact of the proposed project with regard to land use is the removal of topsoil, soil, sub soil, peat and vegetation (primarily forestry).

No likely significant effects were identified in the EIAR on land use, contaminated sites/potential for contamination, soil compaction, soil erosion, geohazards or geological heritage sites during the operational or decommissioning phase. No likely significant effects were identified on land use, contaminated sites, mineral/aggregate resources, or geological heritage sites during the construction phase. Soil

compaction/erosion and geohazards were assessed as slight and slight-moderate effects respectively which are not considered likely significant per the adopted EIAR significance matrix. The Planning Authority would accept these conclusions based on the evidence presented.

The management of peat stability will be ongoing throughout the construction and operational stages of the project and will be managed through the use of a geotechnical risk register. Following application of mitigation measures, including consideration to the siting of infrastructure to minimise the risk, the findings of the planning stage PSRA (Appendix 7-1) indicate a "*low*" to "*negligible*" hazard ranking for instability related to the requirement for excavations on the proposed project subject to appropriate mitigation measures. The site of the proposed 110 kV substation had a '*low*' susceptibility rating from GSI data in 2021.

The removal of natural soil, subsoils, peat and rock and replacement with gravels and concrete for the construction of the infrastructure (temporary and permanent) will result in a change in ground conditions within the proposed wind farm site to include the substation. During the operational phase, effects on land, soils and geology are assessed as limited. No further significant land use change is expected beyond that established during construction. Potential contamination risks are limited to occasional maintenance access and oil-containing equipment, which would be controlled through bunding and routine maintenance procedures. Effects on soil compaction, erosion, mineral resources, geohazards and geological heritage are assessed as imperceptible or not significant. No decommissioning effects arise for these elements of the overall wind farm development which form the current application.

The submitted assessment places strong emphasis on embedded mitigation and good construction practice. Key mitigation measures include implementation of the Spoil and Peat Management Plan, bunded fuel and chemical storage, separate storage of topsoil and subsoil, hydrocarbon interceptors, trenchless techniques at key crossings, concrete management controls, weather-related restrictions on earthworks and geotechnical supervision.

A Peat Stability Risk Assessment (PSRA) has been undertaken for the proposed project by Ciaran Reilly and Associates and is contained within Appendix 7-1 of the submitted EIAR. It is noted that the PSRA has been prepared in accordance with the document '*Peat Landslide Hazard and Risk Assessments, Best Practice Guide for Proposed Electricity Generation Developments – Second edition*' (Scottish Government, 2017) (hereafter known as the Scottish Guidance).

The Peat Stability Risk Register Summary for the proposed site of the substation is '*low*' pre control measure risk rating and '*negligible*' rating post-control measure risk rating. The PSRA indicates that for areas with '*low*' or '*negligible*' ratings that the project may go ahead pending further investigation during the detailed design phase to refine the design.

The PSRA documents that 5 no. shallow peat landslide events are recorded in the vicinity of the subject site, and 2 no. shallow screes slides to the south of the site from an examination of the *Landslide Susceptibility Index* published by Geological Survey Ireland (GSI). The PSRA does not provide further analysis on these recorded events in terms of failure mechanisms, runout behaviour, peat characteristics and similarities/differences with these events and the proposal site conditions. It is noted that section 3.2.2 of the Scottish Guidance requires an examination of previous landslide events.

The land use of the proposed substation is currently forestry. Ground investigation undertaken are listed as peat probing and gouge auger. A peat depth of 0.6 metres was recorded from the probes and 0.5 metres from the ground augers. This is considerably less than was encountered for most of the proposed turbine locations.

The PSRA repeatedly identifies the need for further design-stage peat stability assessments, additional geotechnical review, site-specific temporary works designs, construction-stage supervision, monitoring regimes and ongoing risk reassessment. While such measures may form part of a robust construction management approach, they indicate that important elements of the peat stability evaluation remain to be completed after the grant of consent rather than informing the consent decision itself.

In particular, the assessment concludes that the development is acceptable on the basis that detailed design-stage mitigation measures will subsequently be prepared by suitably qualified geotechnical engineers and implemented during construction. The PSRA envisages future refinement of the design, potential additional site investigations, temporary works design for deeper peat areas, movement monitoring and ongoing review of peat stability risks. This raises the question as to whether sufficient information has been provided at planning stage to conclusively establish the effectiveness of those measures and the residual level of risk.

There also appears to be a lacuna in the information presented regarding the precise implications of the proposed development for peat stability across the wider receiving environment. While the assessment considers stability at individual infrastructure locations, it provides comparatively limited analysis of the potential wider effects arising from cumulative excavation activities, peat excavation and storage, hydrological modification, drainage interventions, borrow pit operations and changes in groundwater conditions across the peatland system as a whole.

It is noted that the submission from the Development Applications Unit, Department of Housing, Local Government and Heritage to the proposed windfarm development raised some concerns in this regard

> *"The Department therefore highlights the potential effects of the proposed development upon peat stability and the associated risks to dependent upslope habitats (i.e. upland Blanket Bog within the Dough/Thur Mtns NHA) and to protected downstream habitats and species in the Lough Gill SAC (site code: 001976) and Lough Melvin SAC (000428). The Department highlights that recent peat slippage incidents in Leitrim and Donegal (e.g. Meenbog wind farm) indicate that the ability of standard mitigation methods to cope with extreme dry and wet periods is unclear. Accordingly, the Department is concerned that the proposed design and citing of the turbines is not sufficiently cautionary and the EIA lacks sufficient evidence to support the efficacy of proposed mitigation measures during extreme dry and wet conditions as well as 'normal' conditions."*

Similarly, although the assessment acknowledges the presence of watercourses throughout the site and proposes mitigation measures to maintain hydrology, the analysis of wider catchment scale consequences, including the potential effects of any peat instability on downstream receptors and watercourses, is relatively limited. The assessment relies principally on mitigation and monitoring measures to control such risks rather than demonstrating in detail the extent to which those risks have been eliminated through design.

The proposed management of excavated peat also illustrates the degree of reliance on post-consent measures. While broad principles are identified, including use of borrow pits for peat storage, limitations on temporary stockpiles and geotechnical supervision, the detailed mitigation measures for peat placement, long-term storage stability, sequencing, capacity and associated geotechnical verification remain matters to be addressed at post-consent stage.

Accordingly, while the PSRA demonstrates a substantial level of planning stage assessment and is generally consistent with the Scottish Government methodology, there remains an arguable concern that aspects of peat

stability assessment have been deferred beyond the consent stage. The resultant information gap limits the ability of the Commission, as competent authority, to fully evaluate the precise nature, extent and significance of potential peat stability impacts within the wider peatland environment and downstream catchments, and to assess with certainty the effectiveness of the proposed mitigation strategy.

In the report prepared by the Environment Department, a number of further observations and recommendations have been made, in relation to:

1. Temporary Waste Storage

Chapter 7 states that surplus excavated bitmac material will be brought to a recycling facility for processing and that all waste generated on site will be segregated and removed by licensed waste hauliers to appropriate facilities. It also notes that bitmac and similar materials will be dealt with under a circular-economy approach.

However, the chapter does not clearly say whether excavated road planings / tarmac will be temporarily stockpiled on site, and, if they are, under what waste authorisation or transfer arrangements that would occur. In other words, the chapter covers final off-site disposal/recycling, but it does not expressly address the legal basis for any interim storage or handling before removal.

Comment
Any temporary on site storage of waste, including excavated bitmac/tarmac, spoil or construction waste, shall occur only in designated areas and in accordance with waste legislation and any required waste authorisation.

2. Excavated Peat and Spoil

Comment
Drawings 05773-DR-151 and 05773-DR-151 identify the proposed cut at the substation to be 14231m3 and the proposed fill to be 13591m3. The receiving site/facility for the remaining 640m3 must be identified and included in the Resource Waste Management Plan (RWMP).

3. Record keeping

Comment
The developer shall maintain records of all waste movements (quantities, EWC codes, collectors, vehicle registrations, receiving facilities,) and make them available for inspection.

11. Hydrology and Hydrogeology

The chapter considers the impact of the proposed development on hydrology, hydrogeology, Water Framework Directive (WFD) compliance, flood risk, hydrologically connected designated sites, and potential transboundary effects due to the site's proximity to Northern Ireland and the hydrological connection to Lough Melvin. The assessment is built around identifying sensitive receptors, pathways and potential pollutant or flow-related impacts during construction, operation and decommissioning.

The proposed GCR is located within several river basins as outlined in Table 8.7, namely Sligo Bay (Garavogue & Owenmore, Manorhamilton) and Bonet. A total of 16 no. waterbodies will be crossed by the GCR. The rivers and tributaries associated with the proposed wind farm site have been reviewed in terms of their respective

Water Framework Directive status as detailed in Table 8-10. According to the GSI online viewer, there are no mapped karst features present with the proposed wind farm site boundary or at work areas along the GCR.

Due to the nature of the proposed grid connection primarily along public roads, with the cable being placed within the road carriageway structure, no groundwater bodies are likely to be encountered. However, the Killarga Ground Water Body (2019-2024 WFD status '*good*' and '*not at risk*'). underlies the proposed HDD river crossing location on the GCR. The GCR recharge rates vary per GSI mapping, though works are not anticipated to result in groundwater recharge related risks. HDD will be used to install the proposed GCR cable under each watercourse, where necessary. The use of HDD will minimise disturbance to aquatic environments, and with implementation of standard mitigation measures, no likely significant effects on surface water quality are anticipated. The likely significant effects on alteration of surface water flow at the proposed GCR works areas are negative, indirect, short term, unlikely, not significant/slight. The underground cable for the proposed GCR will be located in the existing road network. Due to the shallow trenching nature of the works, there are no likely significant effects anticipated on public water mains located in the existing road network.

Pre-mitigation, the potential effects on alteration of surface water quality at the GCR works arise from minor public road accommodations. These works could generate limited sediment run-off or accidental spills. These effects are negative, direct/indirect, temporary, slight (not significant) and unlikely given small-scale works. No instream works are proposed on the GCR. The direct effects on surface water quality typically involve immediate impacts such as sediment runoff, chemical spills, and vegetation removal during construction, which can cause temporary water quality deterioration near the construction area. Indirect effects, downstream may include altered drainage patterns, increased erosion, and pollutant mobilisation that can affect water quality beyond the immediate construction area.

The electrical plant at the substation site (primarily transformers) may contain oil for insulation purposes which may be a potential source of contamination. The presence of hardstand areas may increase the risk of sediment-laden surface water runoff. Surface water arising from roof drainage and surface water associated with the substation will be managed using SuDS, which mimic natural drainage processes to reduce the effect on the quality and quantity of runoff and can provide biodiversity benefits. Due to the design measures and limited activity on the site, the proposed wind farm site, to include the proposed 110 kV substation, is likely to have negative, direct, long-term, not significant to slight effect on the surface water quality. No excavation works are anticipated on the GCR during the operational phase other than in required for maintenance which could include minor excavations, and therefore no significant effects on surface water quality, surface water flow, groundwater quality or flow are predicted. The potential significant effects are limited by the size of the fuel tanks of the vehicles used on the operation, which will be limited to light vehicles and vans with small fuel tanks. As a result, occasional/accidental emissions, in the form of oil, petrol or diesel leaks, could potentially cause slight/negligible temporary and highly localised contamination of surface water quality. The presence of occasional maintenance workers at the proposed substation will lead to the generation of foul sewage from toilets and washing facilities. This foul sewage will be collected and tankered off-site for disposal at a licensed wastewater treatment facility. There are no likely effects from decommissioning as the proposed infrastructure will remain in situ in perpetuity.

The overall windfarm site itself is characterised by a dense network of small upland streams, man-made forestry drains and modified drainage channels, reflecting its upland topography, forestry land use and steep to undulating terrain. These watercourses are generally flashy, eroding streams with moderate to steep gradients, and a number of them are already associated with existing forestry road crossings. Their morphology and topographic setting enhance their capacity to mobilise surface-derived pollutants, particularly during rainfall events. Within the site, drainage generally flows south and west toward the Owenmore (Manorhamilton) and

Brackary systems linked to Lough Gill, and north/northeast toward the Lattone and Ballagh systems linked to Lough Melvin. The most credible contaminant migration pathway identified is surface water runoff. This pathway presents a risk of transporting pollutants off-site and into adjacent surface waters. The approximate location of the proposed Substation relative to the adjoining watercourses is shown in Figure 6.



Figure 6: Location of Substation Site relative to watercourses (Source of base Map – EPA)

A total of 11 no. watercourse crossings are proposed within the proposed wind farm site. One culvert extension is proposed for Aquatic Site 3, crossing an unnamed river (EPA Code: 35_2909) adjacent to the substation compound in the proposed wind farm site. No instream works are necessary to facilitate the extension of this culvert. The groundwater vulnerability of the Glencar GWB at the nearby substation is considered moderate.

Project-specific field sampling at the proposed wind farm site and in associated streams recorded water chemistry broadly consistent with upland catchments influenced by limestone and mixed bedrock geology, including alkaline pH values, low to moderate suspended solids under normal conditions, and variable turbidity linked strongly to rainfall and discharge. Continuous turbidity monitoring since early 2025 confirmed that turbidity remains low in dry periods but can increase significantly during heavy rainfall events, which is typical of flashy upland systems.

A Stage 1 Flood Risk Assessment concluded that the wind farm site and principal infrastructure, including the substation, are not at significant flood risk, and that the development would not materially increase flood risk elsewhere provided the proposed drainage design is implemented. Some historic flood incidents are noted in the wider area, but these are outside the development footprint and do not place the site itself within Flood Zones A or B. No further consideration is required in this regard.

The original report prepared by the Environment Department for the overall windfarm development notes that the hydrogeological setting of the proposed wind farm is more complex. The site overlies a mix of regionally important, locally important and poor aquifers, reflecting the varied bedrock geology. Of particular significance is the Dartry Limestone Formation, which is mapped as a regionally important karstified conduit aquifer. Other formations beneath or near the site include sandstone, shale and limestone units that range from moderate local productivity to generally poor groundwater productivity. The site and surrounding area overlie several groundwater bodies, including Glenaniff, Kiltyclogher, Kilcoo, Killarga South, Killarga, Dromahair and Glencar, all of which are classified as '*Good*' status WFD and '*Not at Risk*' for the current WFD cycle.

Groundwater vulnerability across the site varies from '*Low*' to '*Extreme*', depending on subsoil thickness, peat cover, bedrock exposure and the presence of karst. The northern and northeastern parts of the site, where blanket peat is more extensive, have relatively low recharge and lower permeability, whereas other parts of the site, especially areas with shallow limestone bedrock or karst features, have significantly higher recharge and greater vulnerability. Recharge rates across the site are therefore highly variable, ranging from very low values in peat-dominated zones to very high values where karstified or shallow bedrock conditions occur. The Glencar GWB at the western site entrance is considered to have extreme vulnerability at the nearby substation. Groundwater flow broadly follows local topography and drains toward local streams and watercourses, with some perched groundwater in peat and shallow subsoils, but deeper regional groundwater generally lies well below ground level. Groundwater is treated as medium to high sensitivity depending on aquifer classification, vulnerability and karst presence.

The report prepared by the Environment Department recommends a series of conditions to be attached in the event of permission being forthcoming.

12. Biodiversity

The EIAR outlines that a comprehensive biodiversity impact assessment was undertaken using detailed desk studies, multi-year field surveys, and consultation with relevant statutory bodies to identify ecological constraints to development and to assess likely significant effects during the construction, operational and decommissioning phases of the proposed wind farm development. The design has applied the avoidance, mitigation and compensation hierarchy and best practice guidance. The baseline receiving environment includes a range of important ecological features of variable ecological value from local to international importance, including peatland habitats and protected species such as bat species, otter, and marsh fritillary butterfly. In addition, the development site is hydrologically connected to protected European sites, most notably Lough Gill SAC via surface water but also to a number of other SACs due to ground water connectivity.

The EIAR notes that turbines, tracks and infrastructure have been sited to avoid likely significant effects on European sites, active peatlands and sensitive habitats and the breeding/resting sites of protected species. An Ecological Clerk of Works will supervise all works to ensure compliance and to implement adaptive mitigation where required. Protected species will be safeguarded through pre-construction surveys, exclusion zones and carefully timed works. For example, the project design avoids direct impacts on all known locations of the larval webs of the marsh fritillary butterfly. In addition, exclusion zones and solid screen barriers will be used to protect breeding habitat for the species. Likely significant effects on the listed QIs are not anticipated considering the embedded mitigation measures for the protection of groundwater quality inclusive of the use of existing access roads where possible, the careful construction of new access roads as appropriate inclusive of drainage management, avoidance of karst features, the installation of two hydrocarbon interceptors, and the storage of fuel within bunded areas only.

In order to protect water quality and ensure no likely significant effects on downstream watercourses and European sites, construction activities will be controlled through best-practice environmental management, including strict surface-water protection measures, appropriate buffers will be maintained around watercourses, sediment and erosion control, surface water drainage systems, and the use of clear-span bridges and horizontal directional drilling. Dough/Thur Mountains NHA is located upslope of the proposed wind farm site and approximately 2km form the site of the proposed substation. Dust effects are also not anticipated, as the zone of influence for dust deposition is 50 m and intervening areas of conifer plantation provide additional screening. Accordingly, no direct or indirect effects on peatland habitats within the NHA are predicted.

An Invasive Species Management Plan will control and prevent the spread of invasive species throughout the proposed wind farm site and along the Grid Connection Route.

No concerns arise for decommissioning as the proposed infrastructure the subject of this application will remain in perpetuity.

Following mitigation and compensation, the EIAR concludes that no significant residual effects on biodiversity are anticipated as a result of the proposed development. The biodiversity assessment demonstrates that, although potential significant effects could arise in the absence of controls, following the full implementation of the proposed mitigation and compensation measures, the proposed wind farm development will not result in residual significant effects on habitats, species or European sites during construction, operation or decommissioning.

The Planning Authority would direct the Commission to the previous report prepared for the wind farm development which includes that of the Biodiversity Officer. The *County Leitrim Biodiversity Action Plan 2026 – 2031* sets out a strategic framework to protect, restore and enhance biodiversity across the county, recognising its importance for ecological resilience, climate action and community wellbeing. The Plan adopts a partnership approach involving the Local Authority, communities and stakeholders, and is guided by national and EU biodiversity policy. It prioritises the conservation of priority habitats such as peatlands, wetlands and upland landscapes, the protection of species of conservation concern, and the strengthening of ecological networks and water quality, while promoting biodiversity awareness and integrating nature into land-use planning and development management. The plan is available at:

https://www.leitrim.ie/council/services/biodiversity/county-leitrim-biodiversity-action-plan/

The Leitrim BAP strongly supports Natura 2000 network protection beyond minimum compliance. The Lough Gill SAC is 1.75 km from the proposed substation and directly overlap by Grid Connection Route (GCR) on multiple pathways, namely hydrological, hydrogeological and ecological. Other SACs are linked via groundwater (karst systems) and mobile species (otter, salmon). The density of pathways and proximity presents a high cumulative risk profile. It is respectfully considered that An Coimisiún Pleanála, as competent authority, must be satisfied with regard to the potential impact of the proposed development on the qualifying interests and conservation objectives of Natura 2000 sites.

The Leitrim BAP prioritises water quality protection and safeguarding SAC-linked river systems (e.g. Lough Gill, Melvin) and aims to improve water status, not just to maintain their current status. The Biodiversity Officer expresses a concern due to the extensive hydrological connectivity from the overall wind farm development and direct links to highly sensitive SACs, especially Lough Gill SAC. Some downstream receptors are already at *Moderate* or *Poor* Water Framework Directive status. The submitted EIAR relies heavily on construction-phase mitigation assumptions, which are difficult to enforce long-term rather than avoiding the impact.

Invasive species management is a key Leitrim BAP action area. The EIAR states the existing presence of Japanese knotweed, rhododendron, balsam and American mink. Extensive earthworks and movement of material increase spread risk across catchments. The EIAR sets out that invasive species management will be addressed through a dedicated Invasive Species Management Plan (ISMP). However, the plan focuses mainly on preventing spread, rather than eradication or long-term control and relies heavily on contractor biosecurity compliance during construction.

13. Ornithology

13.1 Overview

The GCR was designed to avoid any nature conservation sites designated for birds. There are no SPAs, Ramsar sites or NHAs designated for birds located within 1 km of the GCR. No bird surveys were undertaken for the GCR. The closest SPA is Ballysadare SPA which is located 16.2 km from the nearest point of the GCR. The Leitrim Upland non-designated important breeding area for hen harrier overlaps with the northern component of the GCR nearest to the proposed wind farm site. There is no plausible pathway for effects on SCI birds due to disturbance, and so the SPA was scoped out of detailed assessment in the submitted EIAR. The proposed GCR is located almost entirely within existing public road corridors, which are artificial habitats and not likely to be important for bird species of conservation importance. Habitat, invasive species, bat and aquatic surveys were carried out for the GCR and any notable bird species were recorded as incidentals if present. Any impact on ornithology will only occur during construction and no impacts are likely during operational phase as the cable will be underground and will remain in place if the windfarm is decommissioned. Habitat types associated with the GCR due to be lost include hedgerow (10 m), mixed broadleaved woodland (0.01 ha) and scrub (0.01 ha), which are due to horizontal directional drilling (HDD) to avoid instream works.

The potential for displacement and collision risk upon important ornithological features which include the hen harrier, listed under Annex I of the EU Birds Directive and amber-listed under BoCCI4, has been considered in the EIAR, with assessment detailed in Section 6.4. The report does not easily distinguish between the 110 kV substation and that of the overall windfarm development. Nesting and foraging displacement have been assessed, and the resulting habitat loss estimates are presented in Appendix 6-12. The Leitrim Uplands non-designated important breeding area overlaps with the proposed wind farm site (only c. 2% of total non-designated important breeding area), and the breeding hen harrier present form part of the Leitrim Uplands breeding population. Therefore, there are pathways for effects and so this ornithological feature was scoped in for detailed assessment. Effects on a small regional population have the potential to contribute to national population status. Surveys recorded regular breeding activity associated with the Leitrim Uplands non-designated Important Breeding Area, with up to two breeding pairs present in most years and occasional evidence of a third pair in the wider area. Nest locations varied between years, and all confirmed nests during the last four seasons were off-site. The number of breeding pairs recorded represents >1% of the national breeding population. No winter roosts were identified on or near the site but still likely some functional usage by foraging birds.

Other birds scoped in for more detailed assessment (breeding season and in some cases non breeding seasons too) included the common snipe, European golden plover, Lesser black-backed gull, White-tailed eagle, common kestrel, Eurasian woodcock and Whooper swan. Curmeen Strand SPA in Co. Sligo was also included as it comes within 20 metres of the Turbine Delivery Route.

It is stated in the submitted EIAR that while some of the adjacent landowners have signed up to hen harrier related prescriptions under agri-environment schemes, there is currently no concerted conservation action in

place at the proposed wind farm site for breeding hen harrier, beyond the general measures that Coillte recommends for hen harrier management within its lands. While the *Hen Harrier Threat Response Plan* (NPWS, 2024) does mention overarching actions to minimise disturbance caused by forestry-related activities to hen harrier in non-designated important breeding areas, there are currently no plans to implement specific conservation actions in the future at the proposed wind farm site.

13.2 Mitigation by Design

It is indicated that the layout of the proposed wind farm has been specifically designed as part of the overall mitigation strategy for breeding hen harrier. It is contended that it is not appropriate to design the turbine layout around historical nesting sites as the nest sites varied year on year likely reflecting ongoing forestry cycles. However, turbines have been sited to maintain a minimum separation distance of 750 m from the two *Nesting Enhancement Areas*, ensuring that operational turbines will be located well outside zones likely to support hen harrier breeding activity. This buffer is considered sufficient to minimise disturbance to nesting birds, reduce the risk of displacement, and prevent behavioural disruption during the breeding season. Construction of the proposed substation will result in a direct loss of commercial conifer plantation, which are generally of lower value to biodiversity and important ornithological features (IOF) species more generally. Direct habitat loss could affect IOF species breeding within the proposed wind farm site, which include hen harrier, common snipe and Eurasian woodcock. None of the habitats to be lost are of particular importance for wintering IOFs because there were no large aggregations of wintering wildfowl or waders recorded foraging or roosting within the proposed wind farm site. There were also no winter roosts for raptors recorded during surveys.

13.3 Hen Harrier Compensation and Enhancement - Additional Compensation Measures

Potential loss of hen harrier foraging habitats due to operational displacement has been assessed comprehensively in the Hen Harrier Foraging Habitat Loss Report (Appendix 6-12). The analysis integrated desk-based research, field surveys, and GIS-based assessment to quantify habitat displacement effects based on both current and future habitat suitability over the lifespan of the proposed project. When planned forestry cycles were accounted for, it was predicted that up to 140 ha of foraging habitat could be lost to foraging hen harrier over the lifespan of the proposed project, which corresponded to 76 ha and 64 ha of higher and lower suitability habitats, respectively. This could potentially have a significant effect on up to two pairs of foraging hen harrier. Given the national importance of even a single breeding pair of hen harrier, a precautionary approach to compensation has been adopted, assuming the need to compensate for the potential loss of two breeding pairs and approximately 140 ha of foraging habitat. Two dedicated nesting enhancement areas (NEAs) will be established, comprising 18.3 ha and 35.85 ha respectively, giving a combined total of 54.15 ha. These areas have been strategically located at least 750 m from all proposed turbine locations and positioned near known nest sites to maximise the likelihood of uptake by breeding hen harrier. The NEAs will be created from low-yield conifer plantation and will be managed to comprise of a mosaic of heath and scrub habitats. Although pre-thicket conifer plantations are also used for nesting, the available evidence indicates that breeding success is higher in open-moorland habitats (heath/shrub and bog) than in forestry habitats, which tend to provide suitable structure only during the early pre-thicket phase. This suggests that maintaining and restoring open habitats is likely to be more beneficial for breeding hen harriers than the rotational forestry currently present on site.

An *Outline Biodiversity Management Plan* (OBMP) (Appendix 6.13) has been prepared. The OBMP also proposes the enhancement of three folios of land totalling 164.25 ha to compensate for the predicted loss of foraging habitat. These lands are all located within 2 km of the NEAs, so are within the core foraging range of breeding hen harrier while also being located at least 450 m from all proposed turbine locations so are unlikely to be

affected by disturbance from turbines. Enhancement measures will include inter alia changes to grazing regimes, rush management, hedgerow establishment and improvement, scrub development, and reduction or cessation of fertiliser application. Peatland habitats within the enhancement lands will also be restored through hydrological management, control of invasive species, and sensitive vegetation management. These measures are fully consistent with the habitat management actions promoted through national hen harrier conservation policy, including the *Hen Harrier Threat Response Plan* (NPWS, 2024). Together with the NEAs, which will also provide suitable foraging habitat as well as nesting habitat, the total area of land enhanced for foraging hen harrier will amount to 218.4 ha, significantly exceeding the estimate of the area of lands from which they are likely to be displaced.

Overall, taking account of the scale of habitat provision (218.4 ha enhanced relative to an estimated 140 ha foraging habitat loss), the siting and disturbance buffers, the evidence base for habitat selection and responsiveness, and the long-term security and management of the measures, and the commitment that the managed areas would provide better quality habitat than that which is present currently, the likelihood of success for the proposed compensatory measures is considered high and no likely significant effects on hen harrier remain.

13.4 Conclusions

The EIAR concludes that with embedded mitigation and good practice measures applied including turbine siting, seasonal timing of works, confirmatory pre-construction checks, disturbance-free buffers, pollution prevention measures, precautionary mitigation to reduce collision risk, operational monitoring and a compensation package for hen harrier, the proposed project is predicted to give rise to no significant residual effects on all assessed IOFs.

The proposed comprehensive compensation package has been designed to offset any potential effects relating to possible displacement of nesting hen harrier and a reduction in functional foraging habitat. This package will support hen harrier breeding productivity within the Leitrim Uplands non-designated important breeding area.

Cumulative and transboundary assessments conclude that no significant cumulative or transboundary effects are expected. A structured post-construction monitoring programme will be implemented to monitor the effectiveness of the mitigation measures.

In summary, subject to the implementation of all embedded and additional mitigation, monitoring, and the committed compensation measures, the proposed project is not predicted to result in any significant adverse residual effects on ornithological receptors at the population levels relevant to the EIAR.

13.5 Report from Biodiversity Officer

The Planning Authority would again direct the Commission to the previous report prepared for the wind farm development which includes that of the Biodiversity Officer.

In the view of the Biodiversity Officer, the submitted Ornithology chapter of the EIAR raises a number of key potential areas of concern / likely non-alignment with the County Leitrim Biodiversity Action Plan (BAP). This chapter raises significant concerns on ornithological grounds, specifically in relation to hen harrier (Circus cyaneus) and its supporting habitat. Hen harrier is a species of high conservation concern, listed on Annex I of the EU Birds Directive, and is a priority species under national biodiversity policy and the County Leitrim Biodiversity Action Plan.

1. Significant Impact on Hen Harrier

Hen harrier is an Annex I species under the EU Birds Directive, requiring strict protection of breeding sites and maintenance of sufficient habitat area and quality. The *Hen Harrier Threat Response Plan* (2024–2028) recognises that the species has declined significantly and may face extinction risk without intervention. Irish objectives are to "*cease, avoid, reverse, reduce or prevent threats*" to the species and its habitats. The protection of Hen Harrier strongly aligns with the Leitrim BAP objectives (upland biodiversity, raptor protection, habitat management).

The subject site overlaps with the Leitrim Uplands which are a nationally important breeding area for Hen Harrier. 1–2 breeding pairs have been recorded on/adjacent to site annually. The EIAR acknowledges a significant impact before compensation and predicts up to 140 ha functional habitat loss for Hen Harrier, which is a significant, long-term negative impact at national scale (pre-compensation). The Biodiversity Officer considers that site selection does not avoid core Hen Harrier territory. Development that causes known habitat loss or functional displacement directly conflicts with national conservation policy.

2. Reliance on Compensation Rather Than Avoidance

The Leitrim BAP emphasises firstly the avoidance of impacts on key species and enhancement as net gain, not a trade-off. The BAP aims to strengthen existing populations, not relocate or offset them. The Biodiversity Officer considered that significant hen harrier impact is not avoided and instead is offset by compensatory measures. However, compensation may not replicate functional habitat loss in the same ecological context. These measures offer a biodiversity trade off rather than protection. Compensation cannot fully replace lost or disrupted functioning territories.

3. Development in a Key Upland Bird Area

The Leitrim BAP strongly supports protection of upland habitat and maintenance of open peatland/heath bird assemblages. EU guidance for wind farm development is clear, and they must seek to avoid impacts on protected species and Natura networks. Bird sensitivity mapping in Ireland was specifically developed to prevent inappropriate siting in key bird areas [birdwatchireland.ie].

The subject site is located within an important non-designated upland breeding landscape. There are sensitive bird species present e.g. hen harrier, snipe, woodcock and red grouse. It is the view of the Biodiversity Officer that sensitive breeding landscapes should be avoided, not mitigated.

4. Disturbance & Displacement Effects During Construction and Operation

The Leitrim BAP emphasises not just habitat retention but the functional use of land by species and protection of viable breeding territories. Disturbance during construction as well as operational turbines can cause displacement of breeding and foraging birds which leads to effective habitat loss. The EIAR states that territory disruption is accepted and compensated.

5. Underestimation of Importance of Non-Designated Areas

The Leitrim BAP places strong value on locally important biodiversity areas and ecological networks. Farmland birds and other passerines are in serious decline and also need protection. The County Leitrim Biodiversity Action Plan emphasises the protection of upland habitats, the conservation of birds of prey and declining bird species and maintaining ecological integrity and connectivity of key landscapes.

The submitted EIAR recognises the upland area of the subject development site as important but relies on designation-driven protection and underplays local biodiversity value outside of the Natura 2000 sites. The EIAR

explicitly does not treat passerines as primary targets and does not refer to passerine conservation priorities (BoCCI red/amber list).

6. Displacement and Habitat Loss

The project is sited within an active hen harrier landscape, leading to acknowledged significant impacts that are managed through compensation rather than avoided. It is the view of the Biodiversity Officer that functional loss of breeding/foraging habitat will have a real ecological impact. The EIAR concludes that there is no significant collision risk for all species based on modelling assumptions. However, surveys in the vicinity have recorded high-sensitivity species e.g. hen harrier, whooper swan and white-tailed eagle. For raptors, displacement and habitat change are often more important than collision. Key findings from the UCC WINDHARRIER project show that prey availability (small birds) decreased near turbines, especially within ~100 m. This directly affects foraging success, which is critical for breeding success. Reduced prey leads to reduced territory quality and eventual territory abandonment. This is functional habitat loss, even without direct mortality.

7. Cumulative Effects Possibly Underplayed

The Biodiversity Officer states that Leitrim has a growing wind energy footprint in addition to sensitive upland bird populations. The Hen Harrier Threat Response Plan explicitly recognises wind energy development as a pressure affecting hen harrier populations. Wind development is listed alongside forestry and agriculture. Hen harrier populations are already small (≈108–157 breeding pairs nationally) and are declining and spatially restricted. Even moderate additional pressures (e.g. local displacement from wind farms) can be significant at population level.

The EIAR finds that there no significant cumulative effects despite multiple nearby wind farms and commercial forestry nearby. The Biodiversity Officer replies that there is clear scientific and policy evidence that hen harriers require large, undisturbed upland habitats, and that wind farm development can reduce habitat quality, prey availability, and territory function. National policy explicitly seeks to avoid threats and restore habitats. Locating wind turbines within an active breeding landscape—where significant habitat loss and displacement are predicted—conflicts with both the precautionary principle and the objectives of the Hen Harrier Threat Response Plan and County Leitrim Biodiversity Action Plan.

13.6 Report from Development Applications Unit

The Department noted that the proposed creation of two Nesting Enhancement Areas (NEAs) respective to two pairs of breeding Hen Harriers regularly utilising the site via the conversion of coniferous plantation. While the Department expresses a preference for such forest to bog/heath restorations over the use of short-term management activities, the Department notes that the one-year lead-in time for the commencement of felling and enhancement works within the proposed NEAs in advance of construction activities is unlikely to provide suitable nesting alternatives as adequate mitigation for potential disturbance/displacement effects arising. Ongoing enhancement works would therefore be concurrent with construction related disturbances.

The precautionary requirement for a maximum disturbance distance buffer of up to 1km from known breeding sites is recommended during highly disruptive activities such as construction works with the associated increased audial disturbances. Notwithstanding any potential habituation to prior human activity that may currently exist (i.e. local roads), this is judged to be of a low-level in contrast to more substantial disturbances imposed by large construction projects such as windfarm developments. Whilst nesting locations have been noted to alter in response to the temporal availability of suitable habitat within conifer rotations cycles, the southern pair is noted to have remained largely within a core breeding area in close proximity to a number of proposed turbines. The CEMP states that works will commence at the southern end of the proposed wind farm

site and therefore would be within the likely disturbance distances of nesting attempts by the southern pair in advance of any future relocation.

The Department notes that the creation of high-quality optimal nesting habitat will require sustained management to ensure the provision of adequate heather growth over a number of years and may not be suitable as alternatives within the short-term. Faster-growing species such as dense-sward grasses and thicket-stage scrub may render habitats as suboptimal for Hen Harrier in the absence of adequate ongoing management. Conifer seeding from adjacent plantations is also expected to occur. Expected timelines for the successful provision of optimal NEAs should therefore be realistic and deliverable. It is therefore recommended that the lead-in time for nesting enhancement works in providing suitable alternatives should be adequately progressed in advance of any potential displacement effects on Hen Harrier from known breeding areas during the construction phase. In addition, the efficacy of successful habitat management within the lifetime of the development should also be deliverable, i.e. the prevention of habitat deteriorations and nesting disturbance/displacement activities.

13.7 Planning Authority Response

The response prepared by the Biodiversity Officer was duly noted. The comments are largely based on the need to conserve and avoid impact, grounded in the actions and objectives contained in the Leitrim Biodiversity Action Plan (BAP) 2026-2031 which Plan was approved after the County Development Plan 2023-2029 was brought into force. The Leitrim BAP in turn is embedded in the County Development Plan 2023-2029, NH OBJ 10 refers.

NH OBJ 10 To support the implementation of the actions contained in the Co. Leitrim Biodiversity Action Plan 2022-2027 when finalised, or any successor plan, in partnership with all relevant stakeholders and subject to the availability of the necessary funding sources.

The overriding policy in relation to biodiversity in the County Development Plan 2023-2029 is provided in NH POL 10:

NH POL 10 To ensure the protection, conservation and enhancement of the biodiversity of the county.

The County Development Plan seeks the protection and sustainable management of the heritage of Co. Leitrim for the benefit of current and future generations. However, it also seeks to support renewable wind energy developments as outlined in the assessment of the principle of the proposed development against the policy framework contained in the County Development Plan. These two objectives may not always be mutually compatible with each other and requires careful balancing of competing objectives in reaching decisions on development proposals.

14. Air Quality

Air quality sampling was not undertaken, on the basis that the receiving environment is expected to have good air quality due to the lack of major air pollution sources in the areas. This is considered to be a reasonable assumption. There are more than 100 highly sensitive residential properties within 20 m of the grid connection route. The submitted assessment indicates that there is a high risk of dust soiling impacts, a medium risk of dust-related human health impacts and a high risk of ecological impacts associated with the proposed works. As a result, best practice dust mitigation measures associated with high-risk works will be implemented to ensure there are no significant impacts at nearby sensitive receptors. In the absence of mitigation, dust impacts are predicted to be direct, short-term, negative and slight, which is overall not significant in EIA terms.

Best practice mitigation measures are proposed for the construction phase of the proposed project which will focus on the pro-active control of dust and other air pollutants to minimise generation of emissions at source. The mitigation measures that will be put in place during construction of the proposed project will ensure that the impact of the project complies with all EU ambient air quality legislative limit values which are based on the protection of human health. Therefore, the residual effect of construction of the proposed project will be short-term, direct, negative and not significant with respect to human health and ecology.

When the dust mitigation measures detailed in the mitigation section of this report are implemented, the residual effect of fugitive emissions of dust and particulate matter from the site will be short-term, direct, localised, negative and not significant in nature and will pose no nuisance at nearby human receptors and sensitive designated habitats. This is in line with the IAQM guidance (IAQM,2024) which states that significant effects on receptors will be prevented by the use of effective mitigation and hence, the residual effect will be not significant.

There will be indirect beneficial impacts to air quality from the generation of renewable electricity from the proposed project. There will be NO_x emission savings which may otherwise have been generated from fossil fuels. This is an indirect, long-term, slight, positive effect on air quality.

The initial report prepared by the Environment Department did not raise any issues with the submitted assessment which concludes that the proposed development will not result in any likely significant adverse air quality effects during construction, operation or decommissioning. With the implementation of the proposed mitigation measures, all residual effects are not considered likely to be significant. The Planning Authority is satisfied that construction effects will not be significant, and the Planning Authority fully accepts that there will be minimal operational emissions. The operational phase is expected to provide a modest long-term positive contribution to air quality through the displacement of fossil fuel electricity generation and corresponding reductions in NOx emissions.

15. Climate

The assessment of climate has focussed on GHG (Greenhouse gas) emissions from the proposed project, over its lifetime and climate change risk assessment, that considered the proposed projects vulnerability to climate change. The EPA state that Ireland had total GHG emissions of 57.6 Mt CO_2e in 2024. This is 1.03 Mt CO2e higher than Ireland's annual target for emissions in 2024. EPA projections indicate that Ireland has used 82.5% of the 295 Mt CO_2e Carbon Budget for the five-year period 2021-2025. This leaves 17.5% of the budget available for 2025, requiring a substantial 10.3% annual emissions reduction for 2025 to stay within budget.

The impact on climate as a result of the proposed project has been assessed as a whole for all phases. The proposed project will result in some impacts to climate through the release of GHGs due to its construction.

The proposed project has been designed to maximise its contribution to renewable electricity generation, significantly reducing climate impacts during operation. The total annual GHG emission savings will amount to 51,333 to 67,373 tonnes of CO_2e. By producing clean energy, the proposed project will directly support Ireland's transition to a low-carbon economy and help mitigate climate change. The project will have a positive annual impact on Ireland's overall GHG emissions of at least 0.4% per year of the national ETS target for 2030.

The proposed project has incorporated some minimal measures to reduce climate change impacts. Once mitigation measures are put in place, the effect of the proposed project in relation to GHG emissions is considered direct, positive and long-term. Guidance states that this is appropriate for a project which:

- The project's GHG impacts are mitigated through '*good practice*' measures.
- The project has complied with existing and emerging policy requirements; and
- Fully in line to achieve Ireland's trajectory towards net zero.

Irelands trajectory to net zero requires significant renewables generated from on and offshore wind farms and sets a high bar for projects with respect to assessment criteria. When considering climate change risk, with design mitigation in place, there are no significant risks to the project as a result of climate change however some vulnerability will remain. Where additional information becomes available, such as updated Eurocodes for design practices, these will be followed during detailed design to ensure the proposed project is robust in its residual climate vulnerability. In accordance with the EPA Guidelines (EPA, 2022), the significance of effect of the impacts to the project as a result of climate change are direct, long term, negative and not significant. No likely significant transboundary effects are predicted.

16. Archaeological, Architectural and Cultural Heritage

This chapter assessed the potential effects of the proposed 110 kV substation and Grid Connection Route (GCR) on archaeological, architectural, and cultural heritage resources.

The location of the proposed 110 kV substation is not affected by any identified cultural heritage sites or features. The closest identified structure within the EIAR is CH55 which was a building depicted on the 1835 and 1908 OS maps, although there are no upstanding remains. There are no Protected Structures, structures included in the NIAH, recorded monuments or any other heritage features impacted by this element of the proposed development. Much of the proposed wind farm site which includes the proposed substation site has been subject to commercial forestry activities, which are likely to have disturbed potential sub surface archaeological remains.

The majority of the proposed GCR will be located within the existing public road network, with a c. 210m section proposed to pass through previously undisturbed pasture fields and the River Bonet. The study area for the GCR is 50 metres from the proposed cable. All previously unrecorded sites or structures of cultural heritage merit, such as buildings of architectural heritage merit (not included in the RPS/NIAH) and archaeological sites not included in the RMP, in addition to all archaeological, architectural and cultural heritage assets subject to statutory protection, including sites listed in the RMP and RPS, NIAH structures and demesne landscapes were considered in the relevant chapter of the EIAR. 8 no. archaeological sites, or groups of sites, including their respective zones of notification are located within 50m of the proposed GCR, along with 5 no. built heritage sites, or groups of sites, and 8 no. previously unidentified sites of potential cultural heritage significance. The demesne landscape (Castle Neymoe) within 50 metres of the GCR is located in Co. Sligo. The proximity of the various built heritage sites is identified in Table 14.8 of the EIAR.

Having regard to the nature of the proposed grid connection primarily within the roadway and to the distance from the buildings (4 no.) listed on the NIAH and 1 no. Protected Structure (No. 162 former Railway Station – Bellanamore Level Crossing), it is not considered that the proposed development will impact on the setting, context or character of an existing of these built heritage features.

In relation to the recorded monuments, the proposed GCR is within the width of existing roads, the construction of which may have disturbed/removed potential associated archaeological remains. The potential exists for sub surface remains to survive and prior to mitigation effects to the 8 archaeological sites will be negative, permanent and have the potential to range from moderate to significant. Works within the zones of notification will be subject to archaeological monitoring. This work will be carried out under licence to the National Monuments Service. If archaeological remains are identified during the course of these works, further mitigation will be implemented as required and agreed with the NMS of the DoHLGH.

The proposed GCR will cross 16 watercourses. Watercourses have an enhanced archaeological potential. No instream works are proposed for natural watercourses, with all cables laid using horizontal directional drilling (HDD). These methods will not result in any effects on watercourses along the proposed GCR. The excavation of the proposed GCR within the area of greenfield has the potential for direct, negative, permanent effects on previously unrecorded archaeological features. Prior to the application of mitigation measures, these effects may range from moderate to significant, depending on the sensitivity of any such archaeological features. Potential effects will be limited due to the narrow, linear nature of the proposed GCR. This will be subject to archaeological monitoring.

The construction of the proposed development will not result in any direct, negative effects on the upstanding remains of recorded archaeological or built heritage resources as none of these sites are located within the footprint of the development that require excavations and ground works. It would be a matter for the National Monuments Service to confirm to the Commission that they are satisfied with this conclusion. It is unlikely with the nature of construction of the proposed grid connection cable primarily under an existing roadway and the nature of the forested land in which the substation is proposed whereby subsurface has been interfered with previously that there would be a likelihood of sub surface features remaining.

Following the application of mitigation measures there will be no significant residual effects on the archaeological, architectural or cultural heritage resource as a result of the construction of the proposed project.

17. Material Assets

The Material Assets assessment focuses on potential interference with telecommunications and aviation activity, possible disruption to utility assets and service provision, and the generation and management of waste during the construction, operational and decommissioning phases. The assessment outlines the extent of consultation which took place with aviation, telecommunications and utility stakeholders.

In comparison to the construction of the actual wind turbines, it is not considered that the construction of the proposed substation or GCR would cause any potential effects on aviation. Telecommunications interference during construction is generally considered unlikely. The main identified potential construction-phase issue relates to the 2RN VHF off-air radio link between Truskmore and Monaghan, where excavation, crane operations and turbine erection could affect signal quality and service reliability if unmitigated. It is not considered that the substation is likely to impact on telecommunications during operation.

There are several locations as where the GCR crosses existing ESB networks (both MV and LV), existing ESB HV overhead lines and underground Irish Water services. A series of proposed mitigation measures are outlined in Section 15.5.1 Construction Phase. No gas network infrastructure was identified within the proposed GCR or the substation works areas.

Operational effects on other material assets are limited. No significant excavations or works are proposed during operation, and no effects on underground services are predicted. The wind farm is expected to support 2–3 long-term technical roles in operation and maintenance. Wastewater generation is estimated at approximately 1,800 litres per year, based on up to three staff visiting once per month, and municipal waste generation is estimated at approximately 922.5 kg per year. Waste and wastewater quantities are therefore substantially lower than during construction and are assessed as giving rise to a long-term, imperceptible, negative effect on local waste services, permanent only for any waste sent to landfill.

With mitigation measures in place, no significant residual effects on aviation, telecommunications, utilities, waste services or other material assets are predicted.

The report prepared by the Environment Department considers Material Assets in their assessment. It is considered that the waste assessment presented in Chapter 15 of the EIAR is not sufficiently detailed to demonstrate compliance with EPA guidance or to support the conclusion that waste impacts will be "*not significant*". The chapter provides only high-level estimates and does not include the level of quantification, waste-stream analysis, or mitigation detail expected for a project of this scale.

The conclusion that wastes impacts are "*not significant*" is not evidence-based due to:

- Lack of detailed quantification;
- Lack of waste-stream analysis;
- No assessment of receiving facility capacity, and;
- No cumulative impact consideration.

To meet EPA and Local Authority expectations, the Environment Department recommends that the applicants should be required to provide:

1. A full Resource & Waste Management Plan (RWMP)aligned waste assessment, including detailed waste stream identification and quantification.
2. A breakdown of all construction, operational and decommissioning waste types, including hazardous waste.
3. Identification of permitted waste collectors and licensed receiving facilities, with confirmation of acceptance and capacity.
4. A commitment to prepare and implement a full RWMP prior to commencement of construction.

A number of observations have also been made in the report prepared by the Environment department in relation to the submitted Construction & Environmental Management Plan (CEMP) and Resource & Waste Management Plan (RWMP). These culminate in the following recommendation:

Prior to the commencement of works, section 5 of the CEMP needs to be updated to include the below for the GCR works. The RWMP shall be prepared in accordance with EPA RWMP Guidelines (2021) and shall include:

- Full identification of all waste streams (construction, excavation, operational, and decommissioning).
- EWC codes for each waste type.
- Estimated quantities (tonnes/m^3) of each waste stream.
- Proposed management routes (reuse, recycling, recovery, disposal).
- Identification of permitted waste collectors and licensed receiving facilities.
- Waste tracking and record-keeping procedures.

18. Major Accidents and Disasters

Chapter 17 of the submitted EIAR deals with Major Accidents and Natural Disasters and assesses both the vulnerability of the proposed project to major accidents and/or natural disasters, and the potential for the project itself to cause such events during the construction, operational and decommissioning phases.

The chapter identifies that the project is located in a geographic context where extreme natural hazards such as earthquakes and tsunamis are not considered materially relevant. However, it acknowledges that severe weather events, including high temperatures, drought, heavy rainfall, snow and extreme winds, may increasingly occur and could disrupt project activity. Climate change-related risks were considered therein, including increased storm frequency or intensity, heightened flood risk and extreme temperatures. However, the *Climate Change Risk Assessment* did not identify any residual medium or high risks to the proposed project, and this risk was therefore screened out from further major accident/disaster assessment.

Flooding was assessed as a potential risk during construction, operation and decommissioning. The *Flood Risk Assessment* determined that the proposed project is located within Flood Zone C, where flood risk is highly unlikely, and that the project will not increase flood risk elsewhere. Fluvial, coastal, groundwater and pluvial flooding risks were therefore screened out from further assessment.

Ground or surface water contamination during construction was identified as a potential risk, with possible causes including heavy rainfall, excavation works, fuel spills, seepage, exposed sediment from stockpiles and erosion. However, this matter was assessed in the hydrology and hydrogeology chapter, and with mitigation measures in place no likely significant effects were anticipated. It was therefore screened out from further assessment.

Peat movement or landslide risk was considered, particularly in relation to excavation, mismanagement of material, storm events or flooding. The *Peat Stability Risk Assessment* concluded that, following mitigation, the hazard ranking for instability is low to negligible, and this risk was screened out from further assessment.

The project is not a COMAH/Seveso establishment, and no Upper or Lower Tier COMAH establishments are located close to the proposed wind farm site. The closest identified COMAH establishment is the Lower Tier Lough Gill Distillery in Hazelwood, Co. Sligo, located approximately 20 km from the wind farm site, approximately 11 km from the Grid Connection Route at its nearest point and approximately 1 km from the Turbine Delivery Route at its nearest point. No likely significant interaction with a COMAH site is anticipated.

Aviation-related collision risk involving low-flying aircraft was considered. The chapter relies on the aviation assessment in the Material Assets chapter and Appendix 15-2, which concluded that no significant aviation effects are anticipated. This risk was therefore screened out from further consideration.

The risks therefore carried forward for detailed assessment were:

1. Striking major infrastructure;
2. Major construction traffic accidents;
3. Collapse or damage of turbine or substation structures;
4. Fire at turbines, substation or forestry; and
5. Ice fall from turbine blades.

The risk of striking major infrastructure during construction was screened in for detailed assessment. This risk relates mainly to potential interaction with unknown strategic underground services, such as power, water, gas and telecommunications infrastructure, particularly during Grid Connection Route works and Turbine Delivery Route accommodation works. Possible consequences include infrastructure damage, disruption to services, injuries or fatalities. Following mitigation, the risk of striking major infrastructure is assessed as very unlikely, with a serious consequence rating and a risk score of 6, placing it in the green/low-risk category. Mitigation includes preliminary desktop utility review, confirmatory checks for water, gas and electricity services before construction, continued consultation, and inclusion of emergency protocols within the Construction Environmental Management Plan and Emergency Response Plan.

Major traffic accidents during construction were also screened in for further assessment. This risk arises from heavy vehicles using narrow roads, temporary traffic management measures, driver error, or failure to follow re-routing or traffic management instructions. The potential severity was considered high enough to require further assessment. Following mitigation, the risk of major construction traffic accidents is assessed as very unlikely, with a serious consequence rating and a risk score of 6, placing it in the green/low-risk category. Mitigation includes implementation of a construction Traffic Management Plan, reduced heavy vehicle movements through use of onsite borrow pits, and ongoing consultation with the Local Authority, An Garda Síochána, emergency services and other stakeholders.

Collapse or damage of turbine structures or substation infrastructure was screened in for further assessment. Potential causes include heavy vehicle collision and severe weather. The risk was considered relevant because of the potential for serious injury or structural damage should such an event occur. Following mitigation, the risk of turbine or substation collapse/damage is assessed as very unlikely, with a serious consequence rating and a risk score of 6, placing it in the green/low-risk category. The chapter notes that confirmatory ground investigation will inform detailed design, competent contractors will be appointed, turbines are designed for high-wind environments, and no dwellings are located within 760 m of the proposed turbine locations.

Fire at turbines, the substation or onsite forestry was screened in for further assessment. Potential causes include lightning strike, equipment failure or wildfire, with possible consequences including infrastructure damage and/or injuries. Following mitigation, the fire risk is assessed as very unlikely, with a serious consequence rating and a risk score of 6, placing it in the green/low-risk category. Mitigation includes turbine lightning conductors, substation fire safety measures, fire walls and shut-off systems, forestry firebreaks, ongoing forestry management and an Emergency Response Plan addressing fire protocols.

The chapter concludes that, with mitigation measures implemented, there will be no significant residual effects from the proposed project in relation to major accidents or natural disasters. It also concludes that no significant cumulative or transboundary effects are anticipated.

The comments of the Fire Office are noted. This report forms Appendix III of this report.

19. Natura Impact Statement

19.1 Overview

The Natura Impact Statement (NIS), prepared by TOBIN, assesses the potential effects of the proposed Lissinagroagh Wind Farm, Co. Leitrim, on European sites. The project comprises 14 no. wind turbines, associated access tracks and drainage, an on-site 110kV substation, an underground Grid Connection Route to Srananagh substation in Co. Sligo, and Turbine Delivery Route accommodation works from Killybegs, Co.

Donegal to the wind farm site. The submitted NIS supports the Stage 2 Appropriate Assessment process for An Coimisiún Pleanála.

The approach to preparing the NIS is summarised therein as follows:

- Describe how the proposed project will affect the key species and key habitats of the European sites;
- Describe how the integrity of European sites is likely to be affected by the proposed project;
- Describe what measures are to be introduced to avoid, reduce or remedy the adverse effects on the integrity of the European sites; and
- Consider findings and determine if potential for adverse effects on European sites remains after such measures have been implemented and in-combination with other plans and projects.

The Appropriate Assessment Screening concluded that likely significant effects could not be excluded, in the absence of mitigation, for a number of European sites within the Zone of Influence. It concluded:

> *"Likely significant effects on the European sites within the ZoI of the Proposed Project, individually or in combination with other plans and projects, cannot be excluded beyond reasonable scientific doubt, in view of best scientific knowledge, on the basis of objective information and in light of the conservation objectives of the relevant European sites. This conclusion has been reached without taking any mitigation measures into account. Therefore, it is considered that the Proposed Project should progress to the next stage of the appropriate assessment process to determine if it will adversely affect the integrity of thirteen European sites and to propose mitigation.*
>
> *We therefore submit that the competent authority, in this case An Coimisiún Pleanála, can determine that an Appropriate Assessment is required for the following European sites:*
>
> - *Arroo Mountain SAC;*
> - *Ballysadare Bay SAC;*
> - *Ballysadare Bay SPA;*
> - *Ben Bulben, Gleniff and Glenade SAC;*
> - *Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC;*
> - *Cummeen Strand SPA;*
> - *Donegal Bay SPA;*
> - *Drumcliff Bay SPA;*
> - *Glenade Lough SAC;*
> - *Lough Derg (Donegal) SPA;*
> - *Lough Gill SAC;*
> - *Lough Melvin SAC;*
> - *Lough Melvin SAC (NI); and,*
> - *Unshin River SAC."*

The main potential impact pathways identified are habitat loss, groundwater contamination or alteration of groundwater flow, sedimentation or contamination of surface waters, disturbance or displacement of qualifying interest and special conservation interest species, bird collision risk, and the spread of invasive alien species. The most significant risks are associated with the construction phase, particularly excavation, dewatering, forestry felling, vegetation clearance, trenching along the Grid Connection Route, watercourse crossings and temporary works along the Turbine Delivery Route.

The habitat loss at construction phase is not within the proposed wind farm site but rather the Grid Connection Route will result in the loss of 10m of Hedgerow (WL1) habitat within the boundaries of Lough Gill SAC to facilitate the proposed temporary launch pit at Horizontal Directional Drill Site 1. A further 0.01ha of (Mixed) broadleaved woodland (WD1) c. 70m beyond the boundary of Lough Gill SAC in Milltown Forest Recreation Area will also be lost. This habitat may be of value for commuting and/or resting European otter, which is a QI species for the SAC.

Groundwater effects are a key issue due to the presence of karstified aquifers. In the absence of mitigation, excavation and dewatering could affect groundwater-dependent habitats and species in SACs such as Arroo Mountain, Ben Bulben, Gleniff and Glenade, Glenade Lough and Lough Gill. Potentially affected receptors include petrifying springs, wet heath, blanket bog, alkaline fens, transition mires, eutrophic lake habitat, slender naiad and white-clawed crayfish. Vulnerability depends on the quantity of contaminants that can reach the groundwater, the time taken by water to infiltrate to the water table and the attenuating capacity of the geological deposits through which the water travels. Groundwater flow through karst areas is extremely complex and difficult to predict. The NIS considers the potential for adverse effects on ground water dependant QI habitats through groundwater contamination associated with site excavation works at T3 and the road cuttings associated with the western site entrance, as well as T11 and the nearby substation and construction compound with regard to the Arroo Mountain SAC. Dewatering to accommodate construction activities at T3 and T11 has potential to cause measurable drawdown of groundwater, which constitutes a potential for adverse effects on the hydrological regime of groundwater dependant habitats.



Figure 7: Lough Gill SAC and the southern entrance to the proposed Wind Farm Site (Source: NIS, Figure 8)

From a Co. Leitrim perspective, the NIS acknowledges the potential contamination from site excavations and dewatering during the construction phase and/or alterations to groundwater flow would constitute the potential for adverse effects on the integrity of **Arroo Mountain SAC** by undermining the conservation objectives for the Annex I habitat type 7220 Petrifying springs with tufa formation (Cratoneurion), for the Annex I habitat type 4010 Northern Atlantic Wet Heath with Erica tetralix and for the Annex I habitat type 7130 Blanket bog (*if active).

With regard to the **Ben Bulben, Gleniff and Glenade SAC**, dewatering at T11 as well as potential contamination from site excavations at T11 as well as the nearby substation, construction compound, and western site entrance, constitutes potential for adverse effects on the integrity of the SAC by undermining the conservation objectives for the Annex I habitat type 7220 Petrifying springs with tufa formation (Cratoneurion), for the Annex I habitat type 7230 Alkaline fens, for the Annex I habitat type 4010 Northern Atlantic wet heaths with Erica tetralix, for the Annex I habitat type Blanket bog (* if active), for the Annex I habitat type 7140 Transition mires and quaking bogs, for the Annex I habitat type 6430 Hydrophilous tall herb fringe communities of plains and of the montane to alpine levels and for the Annex II species 1355 European otter.

The construction phase of the proposed wind farm site, specifically the site excavations along the western site entrance towards the nearby substation and construction compound as well as the turbine hardstand at T11, constitute a source of potential contamination of the Glencar Ground Water Body (GWB). Karstification is extensive throughout the Glencar GWB. As the Glencar GWB also encompass Glenade Lough SAC, this constitutes potential for adverse effects on groundwater dependent receptors within the SAC. As such, there is potential for adverse effects on the QI habitats and species for Glenade Lough SAC which are groundwater dependent as a result of alterations to groundwater quality, flow, and drawdown during the construction phase of the Proposed Project, namely 3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation; 1092 White-clawed crayfish; 1833 Slender naiad.

Lough Gill SAC [001976] is located c. 165m south of the application site boundary for the proposed wind farm site and approximately 2km from the substation and grid connection application site boundary. There will be no loss of QI habitat within the SAC. As such, there is no potential for adverse effects on QI habitats, in light of their conservation objectives, or the overall integrity of Lough Gill SAC as a direct loss of habitat. There is no potential for adverse effects on the groundwater dependant habitats of Lough Gill SAC, namely 3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation; and 91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae).

The NIS considers that there is potential for adverse effects on the integrity of Lough Gill SAC during the construction phase, by undermining the conservation objectives for QI species:

3150 Natural eutrophic lakes with Magnopotamion or Hydrocharition - type vegetation;
91E0 Alluvial forests with Alnus glutinosa and Fraxinus excelsior (Alno-Padion, Alnion incanae, Salicion albae); 1092 White-clawed Crayfish;
1095 Sea Lamprey;
1096 Brook Lamprey;
1099 River Lamprey;
1106 Atlantic Salmon; and,
1355 European otter.

In addition, the presence of Invasive Alien Species along the Grid Connection Route constitutes potential for adverse effects on the integrity of Lough Gill SAC.

Lough Melvin SAC (000428) is located 6.4km downstream of the proposed wind farm site and hydrologically connected via the Lattone 35_010. As such, a hydrological pathway exists between the SAC and the proposed project. There is potential for adverse effects to QIs, specifically those which are sensitive to water quality, namely 3130 Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea; 1106 Salmon (Salmo salar); and 1355 Otter (Lutra lutra). A similar finding was found with regard to the first two QIs in the Lough Melvin SAC (NI).

Hydrological pathways exist to Lough Gill SAC, Lough Melvin SAC, Lough Melvin SAC (NI), Ballysadare Bay SAC/SPA, Cummeen Strand/Drumcliff Bay SAC/SPA, Donegal Bay SPA and Unshin River SAC. Without mitigation, sediment or accidental pollution could affect aquatic habitats, wetlands, salmon, lamprey species, otter, white-clawed crayfish and supporting habitats for waterbirds.

The NIS identifies European otter as a key species requiring protection, particularly along the Grid Connection Route and near certain Turbine Delivery Route locations. Potential impacts include disturbance from noise, lighting, vibration and human activity, as well as the possible presence of unidentified holts or couches. Bird disturbance risks are generally considered limited due to existing traffic disturbance, screening, separation distances and the short-term nature of works. Collision risk for Lesser Black-backed Gull and Herring Gull was assessed, but no functional link with Lough Derg SPA breeding populations was established.

The mitigation measures proposed have regard to the European Commission 2021 Guidance (EC, 2021) and the mitigation hierarchy more generally. The guidelines states that:

> *"The hierarchy of mitigation measures suggests first avoidance (i.e. preventing significant impacts from happening in the first place) and then reduction of impact (i.e. reducing the magnitude and/or likelihood of an impact)".*

In addition to accepted standard good practices, the proposed mitigation measures (summarised in Table 5.1 of the NIS) includes implementation of the Construction Environmental Management Plan, Surface Water Management Plan, Spoil and Peat Management Plan, SuDS drainage, interceptor drains, settlement ponds, silt fencing, no refuelling or stockpiling within 50m of watercourses, groundwater monitoring, buffers from karst features, spill kits and road sweeping. Otter mitigation includes pre-construction surveys, exclusion zones, works restrictions near holts, NPWS consultation and derogation licensing where required.

The NIS also provides for an Invasive Species Management Plan to control Japanese Knotweed, Himalayan Balsam and Rhododendron during construction, operation and decommissioning. The in-combination assessment considered forestry, other wind farms, quarrying, flood relief works and wastewater treatment infrastructure and concluded that no adverse cumulative effects are anticipated with mitigation. Transboundary effects on Lough Melvin SAC (NI) were also assessed, and no residual effects are predicted.

The NIS concludes that following the application of the detailed mitigation measures, in view of best scientific knowledge, on the basis of objective information, it has been concluded that there is no potential for adverse effects on the identified Qualifying Interests and Special Conservation Interest species and their associated targets and attributes, or on overall site integrity, either alone or in combination with other plans or projects, in light of the conservation objectives of these European sites.

The impact assessment has considered all elements of the proposed project in full, inclusive of the Turbine Delivery Route and Grid Connection Route as well as the design flexibility in relation to turbine models. The in-

combination effects assessment, concludes that the proposed project, either individually or cumulatively with other projects, is not anticipated to result in adverse effects on any of the identified European sites. The potential for transboundary effects has been assessed and, taking account of the proposed mitigation measures, no adverse effects on European sites within Northen Ireland or any other neighbouring jurisdictions are anticipated. In summary, there will be no adverse effects on the integrity of any European sites during the construction, operational and decommissioning phases of the proposed project, either alone or in-combination with any other plans or projects.

19.2 Assessment

The Planning Authority would agree with the conclusions of the Appropriate Assessment Screening Statement.

The Planning Authority would consider that the applicant has carried out sufficient and robust mammal and bird surveys in accordance with best practice and guidance to demonstrate that the development on the site would not have an adverse impact on the site integrity of the nearby sites within the Natura 2000 network.

The Planning Authority does not have an evidential basis to dispute the conclusions of the submitted NIS that following mitigation, the proposed development, individually or in combination with other plans or projects would not adversely affect the integrity of the European sites. This conclusion is based on a complete assessment of all aspects of the proposed project, both alone and in combination with other plans and projects, and it has been established beyond scientific reasonable doubt that there will be no adverse effects. On the basis of the submitted NIS, the Planning Authority is satisfied that the proposed development, by itself or in combination with other plans or projects, would not adversely affect the integrity of the European Sites, in view of the sites' conservation objectives.

The original report prepared by the Environment Department on the overall windfarm development concludes that An Coimisiún Pleanála should satisfy itself that adequate detail has been given, in terms of various method statements, design details yet to be provided in order to ensure a full Appropriate Assessment can be carried out by the Commission to determine if the development is likely to have direct, indirect or *'in combination'* impacts on the habitats and/or species for which the nearest Natura 2000 sites are designated.

The Planning Authority would concur with the view of the Environment Department that the Commission, as competent authority, is required to undertake a Habitats Directive assessment of the proposed project noting the employment of specialist ecologists by the Commission to assist in the undertaking of this task. Leitrim County Council has not employed an ecologist to assess the submitted NIS. The Planning Authority notes that there are no comments from the National Parks and Wildlife Service in the submission from the Development Applications Unit in relation to the conclusions of the submitted NIS.

Of significance to the consideration of the proposed development are the provisions of the Renewable Energy Directive (RED) III Directive from the EU. Broadly speaking, the Directive has taken a three-pronged approach to speed up permit granting for renewable energy projects by providing for an application *'completeness check'*, prescribing mandatory permit granting timelines and including specific provisions which target environmental assessments. In EU planning law, IROPI stands for Imperative Reasons of Overriding Public Interest. Under the RED III, IROPI is a critical legal threshold. It allows renewable energy projects to proceed in designated protected areas (such as Natura 2000 sites) if the public benefit of the clean energy outweighs the environmental impacts. Article 16f requires that renewable energy plants be presumed as being in the overriding public interest for the purpose of appropriate assessment under the Habitats Directive. This was transposed into Irish law via the European Union (Planning and Development) (Renewable Energy) Regulations 2025. The Planning Authority is consciously aware therefore of the ability of the designers to compensate for adverse impacts which could not

be mitigated against, relying on the IROPI provisions and address remaining residual adverse impacts through compensatory measures, similar to that proposed with respect to the hen harriers in the Ornithology chapter of the EIAR. The submitted NIS does not rely on such IROPI provisions which is duly noted by the Planning Authority.

20. Development Contributions

The Leitrim Development Contributions Scheme was adopted in 2023 and remains in effect. With regard to Wind Farm Developments, the scheme provides for the following:

Where tip height is <130m: €8,000 per MW subject to minimum of €20,000 per turbine.

Where tip height is >130m: €10,000 per MW subject to minimum of €25,000 per turbine.

It is not considered that the construction of the proposed 110 kV Substation would be subject to the provisions of the Development Contribution Scheme. Similarly, the Grid Connection route would not be a category of development which would be expected to come under the provisions of a Development Contributions Scheme.

In addition, prior to commencement of development, the developer shall be required to lodge with the Planning Authority a cash deposit, a bond of an insurance company, or such other security as may be acceptable, to secure the reinstatement of public roads which may be damaged by the transport of materials to the site of the proposed substation, coupled with an agreement empowering the Local Authority to apply such security or part thereof to the satisfactory reinstatement of the public road. The form and amount of the security shall be as agreed between the Planning Authority and the developer or, in default of agreement, shall be referred to An Coimisiún Pleanála for their determination. It is considered that such matters in relation to the Grid Connection Route would be captured by the Roads Authority in the consent of the required Road Opening License.

21. Community Benefit Fund

The Planning Authority would request that the Commission, in the event of planning permission being forthcoming, would include a condition requiring the developer to adhere to the Community Benefit Fund as outlined in the application documentation submitted for the operational life of the wind farm which would include the substation. The fund shall be administered in accordance with the Renewable Electricity Support Scheme (RESS) Community Benefit Funds Good Practice Principles, 2021, prepared by the Department of the Environment, Climate and Communications.

22. Conclusions and Recommendations

The report prepared by the Planning Authority with respect to the overall windfarm development outlined that there were a number of areas of considerable concern for the Planning Authority with regard to the adequacy of the submitted documentation to the Commission which would allow for a positive decision to be made on the proposed Lissinagroagh wind farm. As the submitted EIAR dealt with the entirety of the project to include the 110 kV substation and Grid Connection Route, some of these concerns would extend to the current application.

At a strategic level, Leitrim County Council clearly supports wind energy development as outlined in the policy support contained in our County Development Plan 2023-2029 informed by our Renewable Energy Strategy and Climate Action Plan. Renewable energy projects are recognised as providing an opportunity to reduce our dependency on non-renewable resources for energy production and contribute to achieving a greater degree

of energy security than is presently the case. The Planning Authority is satisfied that the proposed development is acceptable in principle and accords with national policy in terms of the transition to a low carbon and climate resilient society. It is further clear that there is substantial policy support at regional and local level for the development of the electricity network, such as that which would be facilitated by the proposed development. The Planning Authority therefore considers that the proposed development to be acceptable in principle.

However, that broad policy support does not necessarily render all renewable energy proposals acceptable. The wind farm development proposal presented in the concurrent application, whilst comprehensive and voluminous, was considered lacking in sufficient detail and evidence to demonstrate to the satisfaction of this Planning Authority that the scale of the proposed wind farm can be accommodated at this location with regard to the proper planning and sustainable development of the area. It was not considered that the proposed wind energy development could be endorsed by Leitrim County Council on the basis of the detail, analysis and justifications presented to date. It is necessary to point out to the Commission that such concerns would not extend necessarily to the proposed 110 kV substation and grid connection route elements but to the overall windfarm development.

The report from the Environment Department outlines a series of concerns in relation to the adequacy of the submitted Construction and Environmental Management Plan in relation to, inter alia, incorrect categorisation of wastes, quantification of waste streams, inadequate detail on temporary waste storage and authorisation, hazardous waste procedures are generic in nature and that the decommissioning waste section is minimalist in nature. The report also outlines that a full Resource & Waste Management Plan (RWMP) is required for the proposed development and what such a plan should include.

Should the Commission decide to grant planning permission, the Planning Authority would refer the Commission to the various suggested conditions contained in the reports prepared by the Environment Department, Roads Department and Emergency Services Department in their respective reports. Additional landscaping measures to include semi mature planting should be implemented around the perimeter of the 110 kV substation compound in order to soften the visual impact of the development when the coniferous forestry is felled between the site and the nearby local roadway. Pre and post surveys and reinstatement costs to maintain the structural integrity of the public road network in respect of the underground grid connection installation works should be considered by the Commission although such matters would also form part of the required Road Opening License.

Bernard Greene

Bernard Greene
Senior Planner
Date: 16th October 2026

Appendix I Report from Road Design Department

Review of Infrastructure Development Application – Lissinagroagh Windfarm Grid Connection by Leitrim County Council Infrastructural Department

NOTE: The following is a review of the above application from the roads department of Leitrim County Council (LCC). It will highlight concerns that the roads authority have with the grid connection proposal from a LCC public infrastructure point of view only. It does not include any private lands interface.

Application and Scope of Project:

FuturEnergy Lissinagroagh Designated Activity Company Ltd. have applied under the provisions of Section 182A of the Planning and Development Act, 2000, for a proposed Grid Connection Route (GRC) and a 110kV on-site substation for the proposed windfarm development northeast of Manorhamilton to An Coimisiún Pleanála (ACP). The proposed GRC will facilitate the generation of renewal energy through wind for the security of supply and the reduction of carbon. This development is proposed to meet the National Climate Objective in accordance with Section 3 of the Climate Action and Low Carbon Development Act (2015).

Site Extent and Location:

The GRC for the proposed 110kV connector links the proposed windfarm at Lissinagroagh in Manorhamilton to the County Leitrim border with County Sligo travelling through the following townlands:

Curraghofore, Skreeny, Faughary, Amorset, Clooneen, Milltown, Cornastalk, Srabrick, Cloonaquin, Carrigeencor, Boihy, Aghameelta, Kilcoosy, Corrudda, Cleen, Tully, Killeen, Killanummery, Cleighran, Fawn, Drumahaire, Drumlease and Carrowcrin.

The length of ducting within the public road network is approximately 32Km, consisting of 2.2Km of regional, 0.2Km of Nation and 30Km of local roads. The route traverses 11 No. road bridges, many of which are stone arch bridges of built heritage value.

LCC considers that the construction of the connection cables to the national grid, will have serious effects on the public road network.

Mitigation and Reparation to Public Road Network:

The Infrastructural depart of LCC considers it important that the examination of the proposal should include consideration of the following:

- Examination of all available technologies including both Overhead Line (OHL) and Underground Cable (UGC) options (or combinations of both).
- Route options other than the routing of cables along the public road, including the use of private land agreements, to ensure the best performing route and technology option is selected.
- The public road should only be considered following a robust MCA determining the optimal solution including examining the most linear solutions.
- Examination of the use and/or upgrading existing grid connections along the route to minimise the impact on the public road.

In terms of detailed design of any cable routing impacting the public road network, without prejudice and in accordance with DoT 'Interim Guidelines,' the Roads Department of LCC would recommend the following conditions should apply to any grant of permission that includes the laying of high voltage electricity cable in the road network where that routing is identified as the 'optimal solution' following a robust grid connection selection process;

1. Prior to commencement of development, engagement with the planning authority should discuss and agree the exact route for the HV Cable(s) to identify/agree the routing 'optimal solution' along with the associated requirements for traffic management, road opening licencing, times of work, reinstatement, positioning of chambers/ joint bays etc.

2. A condition requiring the developer to, at a minimum, comply with all appropriate standards and, inter alia the Guidelines for Managing Openings in Public Roads, 2017 in order to ensure orderly development.

3. Electricity cabling shall be laid off carriageway where feasible. If this is not possible, then

- Full width reinstatement of narrow local roads should be carried out.
- Full carriage width reinstatement of regional road should be carried out
- Directional drilling only on the 200m of national road should be carried out

4. Wherever possible, joint bay structures are best located off the carriageway in verges, open spaces, or adjacent sites; and where they must be under carriageway, joint bay structures will be to accepted design standards

5. All the proposed route for the GCR Leitrim County Council have 11 No. bridge assets and these are listed below along with co-ordinates and condition rating.

	Bridge Structure Name	Road No.	Co-Ords	Type/Previously Inspected (Y/N)	Condition Rating

1	Unnamed Bridge	L-4262-0	54.1975,-8.3314	Unknown/(N)	Unknown
2	Bellanagare Bridge	L-4263-0	54.2024,-8.3044	1x Masonry Arch/(N)	Unknown
3	Bellanamore Bridge	L-4165-0	54.2206,-8.2788	1x Concrete Slab/(N)	Unknown
4	Carrigeen Bridge	L-4166-2	54.2387,-8.2725	1x Concrete Slab/(N)	Unknown
5	Kilcooskey Bridge	L-4166-3	54.2583,-8.2422	2x Masonry Arch/(Y)	3 - Good
6	Cloonaquin St. Bridge	L-2169-3	54.2649,-8.2293	1x Masonry Arch/(Y)	1 - Alert
7	Unnamed Bridge	L-2169-2	54.2686,-8.2204	Unknown/(N)	Unknown
8	Cloonlougher Bridge	L-2169-1	54.2884,-8.2088	1x Masonry Arch/(N)	Unknown
9	Ramooney Bridge	L-2169-1	54.2976,-8.1996	Unknown/(N)	Unknown
10	Milltown Bridge	L-2136-0	54.3118,-8.1954	1x Concrete Slab/(N)	Unknown
11	Sheela More's Bridge	R-282-1	54.3077,-8.1782	2x Concrete Slab & 2x Masonry Arch/(Y)	2 - Warning

The routing of high/medium voltage transmission cables (H/MVTC), whether overhead or underground, **must not** impact any bridge structure in a negative way. The roads authority (LCC) would prefer if directional drilling is employed to avoid connect with these structures. A full joint bridge survey will need to be carried out prior to any GRC construction.

6. High/medium voltage transmission underground cables should not be sited on or attached to existing roads structures, masonry bridges/ culverts and the like

7. A condition requiring that the location of the cables would be recorded as exactly as possible, using BIM type technology, so as to facilitate the further use of road space for utilities and the maintenance/construction of the public road by the Roads authority. This record should include as constructed surveys of all infrastructure altered, added, removed or relocated and exact detail of the road construction including any drains or other features encountered. The record should be lodged with the local authority and with the ESB Networks for retention on their records

8. A condition requiring the replacement of culverts that have been excavated during the cable duct placement operation. The replacement culverts should be designed appropriately and include an allowance for the effects of climate change. Note the entire culvert will need to be replaced, and a sleeve connection will not be acceptable.

9. A condition requiring the developer to notify the Roads Authority of the owner of the cables (Owner) and the controller (Power Controller) of the power transmitted along the cables. In addition, the condition should require Owner and Power Controller to notify the Roads Authority of any change in ownership of the cables or change of Power Controller transmitting power along the cables. In all instances the Owner and Power Controller should be required to maintain an agreed contacts list with the Roads Authority.

10. A condition requiring the developer to set out the process for cable installations to be included on the "Dial Before You Dig" system, where collector cable networks, 33kV installations, or contestable electricity development is proposed to be provided in the public road and will not (or likely will not) be taken into charge by the Distribution Network Operator (ESBN) or the Transmission Network Operator (Eirgrid). This is essential for public safety.

In this regard, please refer to Department of Transport Circular RW 05 of 2026 and the 'Interim Guidance to Road Authorities Version 2 (placement of Medium or High Voltage electricity assets)' which can be accessed at:

https://www.gov.ie/en/department-of-transport/publications/electricity-transmission-infrastructure-development-roads-sector-engagement-framework-interim-guidance/

Notwithstanding, in relation to proposed works utilising the public road network, as part of the grid connection routing, it is the LCC Roads Departments opinion that the proposed routing must be undertaken in a manner to avoid the potential to impact on future maintenance, improvement and operation of the road network in this area.



Darragh O'Boyle, C. Eng., Senior Engineer LCC

Appendix II Report from Environment Department

Lissinagroagh Windfarm Grid Connection Route and 110 kV Substation - Internal Referral Response

Environment Section

FuturEnergy Lissinagroagh Designated Activity Company have lodged an application with An Coimisiún Pleanála for the proposed **Lissinagroagh Windfarm Grid Connection Route and 110 kV Substation.** It is not considered a Strategic Infrastructure Development (SID). It is submitted under the provisions of section 182A(1) of the Planning and Development Act 2000, as amended, which deals with Electricity Transmission Lines.

The following are a collation of all Environment Responses for the EIAR and the Construction Environmental Management Plan (CEMP):

Report from Leitrim County Councils Environment Department (Water, Air & Noise) in relation to application with An Coimisiún Pleanála for the proposed Lissinagroagh Windfarm Grid Connection Route and 110 kV Substation.

- As per the Construction and Environmental Management Plan and in order to limit noise disturbance, the hours of non-critical construction activity will be limited to avoid unsociable hours where possible. Construction operations will be restricted to between 07:00 hrs and 19:00 hrs Monday to Friday (excluding public holidays) and between 07:00 hrs and 14:00 hrs on Saturdays. Scheduled and planned critical construction activities (excluding emergencies) will be notified to Leitrim County Council in advance.

- In the interest of preventing water pollution, any forestry clearance works required at the site in preparation for this project shall be carried out in accordance with best practice and adhere to the Forest Service 'Forestry Harvesting and Environment Guidelines' (2000) and the 'Forestry and Water Quality Guidelines '(2000) where appropriate.

- All construction methods and environmental mitigation measures contained in the Construction Environment Management Plan and Ecological Impact Assessment Reports received by the Planning Authority on shall be implemented in full.

- All fuel oil storage and management is to be carried out in line with the specifications outlined in Section 3 of the Construction and Environmental Management Plan. Any significant loss of oil to soils or water shall be treated as an incident, specialists shall be appointed and the incident shall be reported on accordingly. The Environmental Manager is to ensure that fully trained staff are in place. Spill kits, oil absorbent booms, other containment equipment, oil absorbent mats and pads shall be kept at appropriate locations across the site and accessible to the appropriate staff so that they can be deployed within a reasonable timeframe should a loss of oil occur. All spill kit materials are to be replenished after use. All oil storage shall have bunds of 110% capacity, and any refuelling stations should be kitted with appropriate containment materials.

- Long term storage of waste oils on the site shall not be permitted. Waste oils shall be stored in leak proof, secure containers and this material shall be collected by a licenced waste contractor
- The removal of peat prior to storage in the borrow pits shall not be carried out within a 24 hour period prior to any significant precipitation events.

- The appointed Environmental Manager will report any significant pollution or other environmental incidents to Leitrim County Council's Environment Department as soon as reasonably practical following incident discovery. Reporting on incidents shall involve, details of the event, any mitigation works carried out, an assessment of the severity, results of any sampling and monitoring carried out, an action plan to deal with the event and any revisions to construction and environmental management plans as a result of the event.

- Water quality monitoring shall take place prior to and during the construction phase and for the first 6 months of the operational phase. The location of sampling points and the programme of monitoring of water quality shall be agreed with the Planning Authority prior to the commencement of construction. This monitoring, together with visual monitoring, will help to ensure that the mitigation measures that are in place to protect water quality are effective. The Water Monitoring Programme is to include monitoring of streams and from end points of Sediment and Erosion Control system and visual monitoring of Sediment and Erosion Control measures.

- The Environmental Manager is to ensure that the appointed ecologist carries out environmental monitoring at the site to ensure that no water pollution is occurring and that the settlement ponds and silt traps are working and remain effective for the duration of the project. Should settlement ponds and silt containment measures become blocked or ineffective remedial works should be carried out accordingly to ensure no sediment pollution leaves the site. Records of sediment trap inspections and all other environmental monitoring shall be retained for the duration of the project and made available to Leitrim County Council's Environment Department on request.

- Should any significant water pollution (sediment / run off) event occur at any stage during construction works the incident must be investigated by the appointed Environmental Manager and such an event should trigger a review of the site-specific Surface Water Management Plan. Following a peat stability assessment, the risk of instability is considered negligible to low following mitigation procedures, however the risk remains and as sediment movement through drains could be the first sign of peat slippage or movement it is imperative that drains and sediment traps are monitored at regular intervals and or after heavy precipitation events. Any significant sediment movement into the hydrological environment and or signs of peat movement or slippage must be reported Immediately to Leitrim County Council.

- Due to the potential for alterations to groundwater and or surface water flows, particularly when drilling underneath watercourses at the identified bridge crossing locations – it is requested that detailed soil horizons and make up is documented with a detailed method statement as to how those works will be undertaken. Leitrim County Council request

assurances are given from the appointed hydrologist and or hydrogeologists that these activities will not cause any detrimental effects on water quality. Any associated dewatering processes should be carefully monitored and controlled to prevent pollution, sediment run off and or pH alterations. The planning application reports do not indicate that any Ground Investigation as having been undertaken along the proposed grid connection route or specifically adjacent to bridge and water course crossings. It has not been demonstrated by the applicant that the ground conditions at these potentially environmentally sensitive crossings have been sufficiently investigated.

Report from Leitrim County Councils Environment Department (Waste Enforcement) in relation to application with An Coimisiún Pleanála for the proposed Lissinagroagh Windfarm Grid Connection Route and 110 kV Substation.

The Waste Enforcement Officer, Environment Department, Leitrim County Council, completed a desktop review of Chapter 7 – Land, Soils and Geology, Chapter 15 – Material Assets, Appendix 2-4 – Construction Environmental Management Plan (CEMP) and Appendix 2-5 Spoil and Peat Management Plan from the perspective of waste management. The purpose of this review was to assess whether the EIAR adequately identifies, classifies, manages and mitigates waste streams arising from the proposed 110kV substation and a 110 kV grid connection route to facilitate Lissinagroagh Wind Farm, and whether the documentation demonstrates compliance with the Waste Management Act 1996 (as amended), EPA guidance, and best practice.

Chapter 7 – Lands, Soils and Geology

1. Temporary Waste Storage

Observations
Chapter 7 states that surplus excavated bitmac material will be brought to a recycling facility for processing and that all waste generated on site will be segregated and removed by licensed waste hauliers to appropriate facilities. It also notes that bitmac and similar materials will be dealt with under a circular-economy approach.
However, the chapter does not clearly say whether excavated road planings / tarmac will be temporarily stockpiled on site, and, if they are, under what waste authorisation or transfer arrangements that would occur. In other words, the chapter covers final off-site disposal/recycling, but it does not expressly address the legal basis for any interim storage or handling before removal.

Comment
Any temporary on-site storage of waste, including excavated bitmac/tarmac, spoil or construction waste, shall occur only in designated areas and in accordance with waste legislation and any required waste authorisation.

2. Excavated Peat and Spoil

Comment
Drawings 05773-DR-151 and 05773-DR-151 identify the proposed cut at the substation to be 14231m^3 and the proposed fill to be 13591m^3. The receiving site/facility for the remaining 640m^3

must be identified and included in the Resource Waste Management Plan (RWMP).

3. Record keeping

Comment
The developer shall maintain records of all waste movements (quantities, EWC codes, collectors, vehicle registrations, receiving facilities,) and make them available for inspection.

Chapter 15 – Material Assets

Summary of Review
The waste assessment presented in Chapter 15 of the EIAR is not sufficiently detailed to demonstrate compliance with EPA guidance or to support the conclusion that waste impacts will be "not significant". The chapter provides only high-level estimates and does not include the level of quantification, waste-stream analysis, or mitigation detail expected for a project of this scale.

The conclusion that wastes impacts are "not significant" is not evidence-based due to:

- Lack of detailed quantification
- Lack of waste-stream analysis
- No assessment of receiving facility capacity
- No cumulative impact consideration

Required Actions
To meet EPA and local authority expectations, the applicant should be required to provide:

5. A full RWMP-aligned waste assessment, including detailed waste stream identification and quantification.
6. A breakdown of all construction, operational and decommissioning waste types, including hazardous waste.
7. Identification of permitted waste collectors and licensed receiving facilities, with confirmation of acceptance and capacity.
8. A commitment to prepare and implement a full RWMP prior to commencement of construction.

Appendix 2-4 – Construction Environmental Management Plan (CEMP)

The CEMP contains operational procedures for handling materials, concrete, hydrocarbons and general waste.

Observation
The CEMP lists "common wastes" and "hazardous wastes" but does not assign European Waste Catalogue (EWC) codes to the "common wastes".

This is a regulatory requirement under:

- Waste Management Act 1996
- Waste Collection Permit Regulations
- EPA RWMP Guidelines

Comment
The CEMP cannot function as a compliant RWMP without EWC coding.

Observation
The CEMP does not identify storage of bitmac/tarmac planing, concrete washout volumes, timber waste, cable offcuts, packaging waste and hazardous waste for the GCR.

Comment
Authorisation needs and suitability of a receiving facility cannot be accessed without the quantification of waste streams.

Observations
No detail on temporary waste storage or authorisation.
The CEMP states that waste will be segregated and stored in designated areas before transport to licensed/permitted facilities, that waste hauliers will require collection permits, and that waste movements will comply with relevant regulations. It does not expressly state whether temporary on-site waste storage requires a waste permit or exemption. This should be clarified by the applicant/contractor in the final CEMP.

Hazardous waste procedures are generic and lack receiving facility detail.
The CEMP states that contaminated material from oil leaks/spills will be removed from the area and disposed of at a licensed facility, and that a detailed spill response and control procedure will be developed in the Contractor's RWMP. However, it does not include a standalone RAMS for removal, classification, temporary storage, transport and disposal of contaminated material. This should be added.

Comment

<u>Resource & Waste Management Plan (RWMP)</u>

Prior to the commencement of works, section 5 of the CEMP needs to be updated to include the below for the GCR works. The RWMP shall be prepared in accordance with EPA RWMP Guidelines (2021) and shall include:

- Full identification of all waste streams (construction, excavation, operational, and decommissioning).
- EWC codes for each waste type.
- Estimated quantities (tonnes/m^3) of each waste stream.
- Proposed management routes (reuse, recycling, recovery, disposal).
- Identification of permitted waste collectors and licensed receiving facilities.
- Waste tracking and record-keeping procedures.

Adrian Kielty
Senior Engineer
12th October 2026

Appendix III Report from Emergency Services Department

To: **Senior Planner**

From: **Nathan Gregg, SACFO**

Planning Ref. **ACP-324290-26 - Lissinagroagh Wind Farm**

Date: **09/10/2026**

Based on a review of the planning documentation the following are the observations and comments of the Fire Authority in respect of the proposed Grid Connection Route and Permanent on-site 110kV Substation referenced above:

1. The proposed Substation Building is subject to the requirements of the Building Regulations and shall be designed and constructed in accordance with the appropriate requirements of the 2nd Schedule.
2. A Fire Safety Certificate and a Disability Access Certificate shall be applied for and in the case of the Fire Safety Certificate, works shall not commence until a grant has been entered onto the Statutory Register
3. A commencement notice must be submitted in advance of the commencement of works and a certificate of compliance on completion must be valid before occupation or use of the building.
4. The proposed works should be in accordance with Table 5.2 of Technical Guidance Document B Fire Safety, 2006, and, in particular roadways should be provided with a minimum carrying capacity of 26 tonnes in accordance with the heaviest appliance operated by Leitrim Fire Service.

Nathan Gregg

Senior Assistant Chief Fire Officer
Leitrim County Fire Service