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Date: **11 October 2026**

The Secretary
An Coimisiún Pleanála
64 Marlborough Street
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RE: Submission / Observation on Application Reference ACP-324597-26 (VA12.324597)

Proposed 110 kV substation and 110 kV grid connection route to facilitate the Lissinagroagh Wind Farm, in various townlands across Counties Leitrim and Sligo — application by FuturEnergy Lissinagroagh Designated Activity Company under section 182A of the Planning and Development Act 2000 (as amended).

Related application: ACP-324290-26 (PAX12.324290), Lissinagroagh Wind Farm.

Dear Secretary,

We, Ian and Angeline Pudney, of Blairbeag, Shasmore, Rossinver, wish to make this submission and observation objecting to the above grid connection application. We make it under section 182A of the Planning and Development Act 2000 (as amended) and Article 217 of the Planning and Development Regulations 2001 (as amended). The €50 fee accompanies this submission. We previously made a detailed submission objecting to the Lissinagroagh Wind Farm application (ACP-324290-26), which we rely on and enclose here: because the applicant presents one project, assessed in a single Environmental Impact Assessment Report (EIAR) and a single Natura Impact Statement (NIS), the grounds in that submission bear equally on this application.

1. Who we are and our standing

We live at Blairbeag, in the townland of Shasmore — the same townland in which the wind farm's turbines are to be built, including Turbine T3, the turbine closest to our home (approximately 875.72 m away) and sited on the slopes of Saddle Hill. The applicant's own Annex I Habitat Report (AECOM, January 2025) confirms that "Site A," which "encompasses the summit and nearby surroundings of Saddle Hill" and contains a proposed turbine, lies within the townland of Shasmore. The proposed 110 kV substation is in the immediately adjacent townland of Faughary. Our home, our amenity, our water supply, our use of the local roads and our enjoyment of everyday life all stand to be directly and permanently affected by this development. We therefore have a clear and legitimate interest in its determination, and we make this observation as directly affected residents.

2. This application cannot be separated from the wind farm, and both should be refused

2.1 The applicant itself states that this application and the wind farm application "are functionally interdependent and constitute a single project for the purposes of Environmental Impact Assessment," and that both are accompanied by one EIAR and one NIS (Site Notice; Planning Statement). The entire

policy justification for the substation and the 32 km cable is derived from the wind farm: the Planning Statement says the grid connection supports renewable-energy policy "by enabling the export of renewable electricity generated by the Lissinagroagh Wind Farm to the national grid." No independent function for the substation or cable is identified.

2.2 It follows that, if the wind farm is refused, the justification for this development falls away entirely. A 110 kV substation and 32 km of cable in the public roads of two counties, serving no generating station, would not be proper planning and sustainable development. We respectfully submit that the two applications should be determined together, and that this application should not be approved unless and until the wind farm is approved.

2.3 The permanence of what is proposed sharpens the point. The Planning Statement records that the substation and cable "will not be removed at the end of the useful life of the wind farm project as it will form part of the national electricity network." Permanent, regional grid infrastructure, justified solely by a generating station with a stated operational life of 35 years, calls for particular care before consent is given — and for the project to be seen, and assessed, as the single development it is. This engages the principle in O'Grianna v An Bord Pleanála [2014] IEHC 632 that, where a grid connection forms part of a single project, its environmental effects must be assessed to the same standard as the generating station it serves.

3. The strategic fragmentation of a single industrial project

3.1 This is the aspect of the application that concerns us most, and we ask the Commission to look at it squarely. What is in truth one very large industrial development is being presented to the Commission, and to the public, as a series of separate applications:

- the Lissinagroagh Wind Farm itself (ACP-324290-26) — 14 turbines up to 185 m, three borrow pits, a meteorological mast, construction compounds, and a turbine delivery route;
- this application (ACP-324597-26) — a permanent 110 kV substation and a 32 km, two-county grid connection to the Srananagh 220 kV substation in south Sligo; and
- a further, future application for the turbine-delivery-route accommodation works, which the applicant has now expressly confirmed "do not form part of the current planning application" and "will be subject to a separate planning application" (Response to Submissions, Tobin, 9 September 2026).

3.2 Taken together, these consent processes describe a single development of genuinely regional scale. The components of the turbines are to be landed at the port of Killybegs, in County Donegal, and hauled along a delivery route running through Donegal, Sligo and Leitrim — the Site Notice lists delivery-route townlands as far north and west as Killybegs, Finner, Dunkineely and Bruckless. The generating station would sit on Saddle Hill, in our townland of Shasmore. The 32 km grid cable would then run south and west through the public roads of Leitrim and Sligo to the Srananagh 220 kV substation near Ballintogher. The true footprint of this project therefore stretches across the entire North West — from the quayside at Killybegs to a 220 kV substation in south Sligo.

3.3 Presenting that single development as three separate applications, each assessed by reference to the same wind-farm EIAR, has a predictable effect: no one application requires the Commission or the public to confront the full, combined and cumulative scale of what is proposed. The road-network impacts are split between the wind-farm application, this application and a promised future application; the European-site and water impacts are spread along a 32 km corridor that the wind-farm assessment never had to grapple with as a whole; and the sheer industrial magnitude of the project is diffused across three

files and three comment periods. In our respectful submission, this is not an accident of process. It is a deliberate strategy to fragment the development, to play down its true scale, and to make it harder for the Commission and for ordinary residents to see — and to object to — the project as the single, regionally significant industrial undertaking that it is. It is, in plain terms, a divide-and-conquer approach, and we ask that it be seen for what it is.

3.4 Irish and European law does not permit a project to be split so as to avoid, or to dilute, a comprehensive environmental assessment (see, for example, O'Grianna, and the discussion of project-splitting in Coyne v An Bord Pleanála). We ask the Commission to treat the wind farm, this grid connection and the promised delivery-route works as the single project they plainly are, and to require that their effects be assessed, cumulatively and in the round, before any part is consented.

3.5 This concern is compounded by scope. Although this application covers a very much larger geographic area than the wind farm — a 32 km cable corridor across two counties — it leans almost entirely on the environmental reports prepared for the wind farm, and does not appear to widen the scope of assessment to match its own footprint. The same EIAR and the same NIS are simply re-used. A single assessment designed around a hilltop in Shasmore is not a sufficient basis on which to consent 32 km of works through the roads, rivers and communities of Leitrim and Sligo.

4. The shared EIAR and NIS are deficient, and the wind farm is inappropriate

Because one EIAR and one NIS serve both applications, the deficiencies identified in our submission on the wind farm (enclosed) bear equally on this application. We reinforce, in particular:

- **Turbine T3 and Saddle Hill, in our townland of Shasmore.** The applicant's own Annex I Habitat Report (AECOM, January 2025) confirms that the turbine location on Saddle Hill sits on cut-over degraded blanket bog, with priority Annex I habitats close by — H7130* priority active blanket bog to the west and priority H8240* limestone pavement on the southern slopes — and records "several steep depressions in the blanket bog, presumably resulting from sink-holes in the underlying limestone." That is direct, applicant-sourced confirmation of the blanket-bog, karst and ground-stability concerns we have raised, in the very ground on which T3 and its hardstand are to be built.
- **A direct, unassessed pollutant pathway to a European site.** The omission of a defined watercourse running from T3 down the western flank of Saddle Hill to the Ballagh River and Lough Melvin SAC (developed in our wind-farm submission), and the consequences that follow for the Water Framework Directive assessment and the Appropriate Assessment.
- **The remaining residential and environmental grounds.** The shadow-flicker, noise, landscape and visual, heritage, traffic and equestrian grounds set out in our wind-farm submission, and the pervasive reliance on post-consent mitigation, compensation and design flexibility rather than the avoidance of harm by design. We adopt and rely on all of those grounds here.

On the grid connection specifically, we support the detailed analysis set out in the submission of the Save Dough Mountain community group on this application, and in particular:

- that the account of route alternatives in EIAR Chapter 3 is materially inaccurate on the applicant's own documents — the applicant's own route study (Appendix 3-1) recommended a different route (Option 4), Chapter 3 does not disclose or explain that recommendation, it describes Option 4 using text belonging to Option 3, and it records Lough Gill SAC against every rejected route but not against the chosen route, which the NIS confirms lies within the SAC for approximately 920 m;

- that the Appropriate Assessment does not assess the directional drilling beneath the River Bonet within Lough Gill SAC — it assesses the launch pits (more than 50 m from water), but not the bore itself, which passes approximately 1.5 m beneath the bed of a salmon and lamprey river inside a European site, in a karstified setting, at a depth still subject to investigation, with no drilling-fluid specification and no breakout or inadvertent-return contingency;
- that a second wind farm (Tullintowel, 76.8 MW) is contemplated in the applicant's own route study, with the cable to be sized and jointed to allow it to connect later, yet does not appear in the EIAR, the NIS or the cumulative assessment;
- that the construction effects of installing 30.6 km of cable in the public roads of two counties — up to 30 months of works, full road closures where a Stop/Go system is not possible, and joint bays that may sit in the wheel track of narrow local roads — are assessed as "slight" and "temporary" without the schedules of closures, diversions and joint-bay locations needed to support that conclusion; and
- that the application is internally inconsistent on basic parameters — the number of HDD crossings, the number of watercourse crossings, the maximum length of open trench, and the route length all differ between documents.

These are not matters of detail. They go to whether the Commission can lawfully be satisfied, on the applicant's own documents, that this development will not adversely affect the integrity of European sites, and that its true effects have been assessed at all.

5. Our Shasmore perspective: the impact on our everyday lives

5.1 We make this observation, above all, as residents. Shasmore is our home. Saddle Hill — "Site A" in the applicant's own habitat survey — is the hill we live beneath, in the townland we live in. Turbine T3, the nearest turbine to our house at approximately 875.72 m, together with its hardstand, cut, access track and drainage, would be built on that hill, in Shasmore, on the cut-over blanket bog and karst ground described above.

5.2 What this development would take from us is not captured by any figure in the EIAR. It is the quiet, rural character of the place we have made our home; the undeveloped skyline of Saddle Hill; our ability to work, rest and sleep at home without the intrusion of shadow flicker (for which T3 is the single greatest source in the scheme) and turbine noise; the safe use of our local roads, including for our horses, through years of heavy construction and abnormal-load deliveries; and the security of our water. These are the ordinary enjoyments of living where we live, and they would be degraded, in our direct experience of this land, by the industrialisation of the hill above us.

5.3 And we would not bear this once, but over and over. If each of the three applications is consented and built in turn, our townland and the roads around it face the wind-farm construction, then up to thirty months of grid-connection works, and then the delivery-route accommodation works — a prolonged sequence of disruption that no single assessment before the Commission has ever considered as a whole. For us, that combined burden is the reality of this project, and it is precisely the reality that the fragmentation of the application into separate consents conceals.

5.4 We say, simply and from experience, that this is the wrong development in the wrong place. The hill in our townland is priority blanket bog over karst, not an industrial site; the roads are rural lanes, not haul routes; and our home is a home, not a receptor number.

5.5 As we both work from home, we fear this industrial scale development will have a significant impact on our health and wellbeing, desecrating our beautiful landscape, fragile natural environment and

intruding on our daily lives through noise, shadow flicker, traffic congestion and disruption. Furthermore we have not been afforded the fair opportunity to assess the cumulative impact of the various parts of this development, existing Faughary windfarm, proposed 14 turbines, proposed grid connections and proposed transport routes as the separate applications do not demonstrate or consider impacts out with their individual scope.

6. Conclusion and request

6.1 For the reasons above, and for the reasons set out in our enclosed submission on the wind farm, we respectfully request that An Coimisiún Pleanála REFUSE permission for the proposed substation and grid connection.

6.2 In the alternative, we ask that:

- this application be determined together with the wind farm application (ACP-324290-26), and refused if the wind farm is refused;
- the Commission treat the wind farm, this grid connection and the promised delivery-route accommodation works as a single project, and require their cumulative effects — across the whole corridor from Killybegs to Srananagh — to be assessed in the round and open to public comment before any part is consented; and
- no decision be made until the applicant has provided, and the public has had the opportunity to comment on, the further information identified above, including a revised NIS that assesses the drilling beneath the River Bonet and a corrected account of route alternatives.

6.3 We would be grateful to be kept informed of the progress of this application and of any oral hearing.

We confirm that the €50 fee accompanies this submission.

Yours faithfully,





IAN & ANGELINE PUDNEY

Enclosure: our submission on the Lissinagroagh Wind Farm (ACP-324290-26).

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Date: **July 7, 2026**

The Secretary

An Coimisiún Pleanála

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RE: Submission / Observation on Application Reference -PAX12.324290 (ACP-324290-26)

Proposed Lissinagroagh Wind Farm — application by FuturEnergy Lissinagroagh Designated Activity Company for a Strategic Infrastructure Development under section 37E of the Planning and Development Act 2000 (as amended), for a 10-year permission for 14 no. wind turbines (blade tip height 180–185 m) and all associated infrastructure, in the townlands of Boleyboy, Cashelaveela, Cherrybrook, Killea, Coolodonnell, Faughary, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle and Tullyskeherny, Co. Leitrim (approximately 3 km northeast of Manorhamilton).

Case type- Private Development - REDIII Application

Parties- FuturEnergy Lissinagroagh DAC (Active)

Dear Secretary,

1. Introduction

We, **Ian & Angeline Pudney** wish to make this submission / observation objecting to the above application. We make it under section 37E of the Planning and Development Act 2000 (as amended) and Article 217 of the Planning and Development Regulations 2001 (as amended). The €50 fee accompanies this submission.

This submission relates both to the implications of the proposed development for the proper planning and sustainable development of the area, and to the likely effects on the environment and on European sites of the proposed development if carried out.

For the reasons set out below, we respectfully request that An Coimisiún Pleanála **REFUSE** permission. Many of our concerns are drawn directly from the applicant's own Environmental Impact Assessment Report ("EIAR") and Natura Impact Statement ("NIS"), which in several respects acknowledge significant effects and then rely on future mitigation, compensation, design flexibility and post-consent operational controls to conclude that those effects are acceptable. We say that this leaves key matters insufficiently certain to grant permission.

2. Our property and its relationship to the development

Our home is identified in the applicant's own documents as Residential Receptor 329 (Appendix 4-1) and as Shadow Flicker Receptor 20 (Chapter 10). The applicant's assessment confirms that our dwelling lies only **875.72 m** from the nearest proposed turbine, Turbine 3 ("T3"), making it one of the closest residential receptors to the entire development. At 875.72 m from a turbine of up to 185 m tip height, our home is barely 4.7 times the tip height away.

We also already live with the daily noise disruption of existing Faughary Wind Farm (3 turbines) approximately 1.4 km away. The present application must therefore be assessed not on a blank canvas, but in combination with turbines we already experience daily. Our concerns below should be read as a combined, cumulative impact on our home and on this rural community, rather than as a list of isolated issues.

We both work from home. Unlike households whose occupants are away for much of the working day, we are present at our dwelling throughout the day and night, and would therefore be exposed to the noise, shadow flicker and visual effects of the development on a continuous, 24-hour basis. We ask that this be given significant weight in assessing the residential-amenity effects on our home.

We also keep horses at our home and on the adjacent family farm. Horses are highly sensitive to noise and to sudden or moving shadows, which can trigger severe behavioural and stress-related reactions. Sudden noise, moving shadow flicker and the rotation of turbine blades are recognised flight triggers for horses, creating a risk of injury to the animals and, when horses are being ridden or handled, a real safety risk to riders and handlers. Given the proximity of the turbines — in particular T3 at 875.72 m — and the use

of the surrounding land and rural roads for keeping and exercising horses, we are concerned both for animal welfare and for the safety of those riding and handling them.

3. Grounds of objection

3.1 Unacceptable cumulative loss of residential amenity

Our principal concern is the cumulative loss of residential amenity arising from the combination of effects on a dwelling so close to the development: increased and cumulative turbine noise (including at night); shadow flicker from turbines to the south-east of the house; the visual dominance of fourteen turbines of up to 185 m; continuous blade movement and aviation lighting; and the addition of a large new wind farm on top of the existing Faughary turbines we already live with.

Taken individually, the applicant presents each effect as "manageable". It is the combined effect on daily living that is decisive. We submit that the proposal would materially and unacceptably diminish our ability to enjoy our home, contrary to the proper planning and sustainable development of the area. Where a dwelling is this close, we ask the Commission to assess noise, shadow flicker, visual dominance and living conditions together, not in isolation.

Any consequential reduction in the market value of our property would be a symptom of that amenity loss rather than a separate planning ground. We note that studies in Ireland, the UK and Europe have reported reductions in the value of homes located close to large turbines where amenity, noise and visual concerns arise, with reported figures varying widely. We raise this only as evidence of the seriousness of the amenity impact.

3.2 Shadow flicker — not avoided by design, only "managed"

The proposed turbines lie to the south-east of our dwelling. This is the classic geometry for significant shadow flicker in autumn, winter and early spring, when the sun is low in the southern sky and blades pass across the solar disc — precisely the conditions our home faces.

Our home is not a hypothetical example: it is the applicant's own Shadow Flicker Receptor 20 (Chapter 10, Tables 10-1 and 10-2; Appendix 10-1), also identified as Residential Receptor 329 (Appendix 4-1). The applicant's own modelling records a worst-case annual total of 68 hours 59 minutes of shadow flicker at our home, with a maximum of 1 hour 8 minutes on a single day, and 66 separate days in the year on which the 30-minute daily threshold is predicted to be exceeded. That is more than double the 2006 WEDGs guideline of 30 hours per year, and more than double the 30-minute daily guideline, at our own dwelling, on the applicant's own figures.

This is not an isolated result. The applicant's own assessment records that the 30-hour annual threshold is predicted to be exceeded at 28 of the 84 receptors assessed — a third of all dwellings within ten rotor diameters — and the 30-minute daily threshold at 29 receptors, rising to 30 and 31 respectively once the applicant's own separate cumulative

assessment (incorporating the existing Faughary turbines we already live beside) is taken into account. Immediately around our home the same pattern repeats: Receptors 3, 12, 17, 19, 63, 67 and 84, all in the same cluster of dwellings near Turbine 3, each show worst-case totals of between 66 and 85 hours per year. Appendix 10-1's own turbine-by-turbine breakdown shows that Turbine 3 alone is responsible for a worst-case total of 541 hours and an "expected" total of over 72 hours of flicker across the receptor network — several times more than any other turbine in the scheme. T3 is also the nearest turbine to our home, at 875.72 m. This is not a scattering of unrelated outliers; it is the predictable consequence of siting T3 this close to a cluster of homes, and it reinforces the concern we raise separately at Section 3.5 that T3 should not be permitted.

The applicant relies on the "expected/realistic" scenario, and on turbine shutdown, monitoring and curtailment, to conclude there will be "zero" (or "near zero") shadow flicker at any occupied dwelling, including ours, once mitigation is applied. Tellingly, the same pattern holds even in the applicant's own cumulative modelling: one nearby receptor's worst-case total rises from 64 hours 48 minutes for the proposed wind farm alone to 97 hours 7 minutes once the existing Faughary turbines are added, with the number of days experiencing any flicker rising from 181 to 244 days a year — yet the applicant nonetheless concludes there will be "no additional likely significant effects" and "no likely significant cumulative effects", again solely on the strength of the same shutdown commitment.

This exposes an internal contradiction that runs through the applicant's entire shadow flicker case, standalone and cumulative alike: the modelling simultaneously predicts significant flicker — at our home and at dozens of others — well in excess of the applicant's own applied thresholds, while asserting that none of it will actually occur once the turbines are curtailed. Both statements can only be true if the turbines are routinely and reliably shut down for the full 35-year life of the project, under a scheme that is designed, operated, monitored and adjusted entirely by the applicant/operator itself. The EIAR provides for residents to raise concerns after the fact, but no independent verification, auditing, or reporting of the scheme's actual performance to the planning authority. That is not avoidance of impact by design. It is a design that creates the problem and then relies on future, self-administered and self-monitored operational intervention — unverified by us or by any independent party — to suppress it for the life of the development.

We are further concerned that the shadow flicker modelling expressly states that line-of-sight calculation was deactivated, so that screening by hills, forestry, vegetation and buildings was not taken into account, and that every receptor, including ours, was modelled as a standardised 1 m × 1 m "greenhouse mode" aperture with an assumed eye height of 2.0 m. This is a conservative modelling convention, but it also means the model does not reflect the actual orientation, window positions, existing screening or occupancy pattern of our home. We ask the Commission to require, as a condition of any permission: (i) site-specific verification of predicted shadow flicker at our dwelling based on its actual windows, orientation and existing screening, rather than reliance on the generic modelled receptor alone; and (ii) that the Turbine Shutdown Scheme be subject to independent monitoring and periodic reporting to the planning authority, with defined response times for resident complaints, rather than being verified solely by the applicant/operator on a

self-assessed basis. Reliance on an unaudited, self-administered curtailment regime should be treated as evidence that the shadow flicker impact on our home has been managed after the fact, not avoided by design.

3.3 Noise — the Noise and Vibration assessment is unreliable and not in accordance with best practice

We already live with noise from the existing Faughary Wind Farm, and fourteen additional and substantially larger turbines would add to it. As noted above, we both work from home and so are exposed to this day and night. Beyond that lived concern, however, we have examined EIAR Chapter 9 (Noise and Vibration) and its appendices in detail and have identified numerous errors that, in our submission, undermine the reliability of the entire noise assessment — including the levels predicted at our own dwelling and the cumulative assessment. Although Chapter 9 states that the Institute of Acoustics "Good Practice Guide to the Application of ETSU-R-97" (May 2013) ("the IOA GPG") "is considered to represent best practice and has been adopted in this assessment", the errors set out below show that it has not been properly applied.

For our own dwelling (H0329), the applicant predicts a cumulative operational noise level of up to 38.4 dB LA90 (Appendix 9-7) and presents it as compliant with the applicable limits. That prediction, and the site-specific limits it is measured against, are only as reliable as the baseline survey and the data underpinning them. As set out below, that baseline survey is affected by errors so numerous and fundamental that, in our submission, no reliable conclusion about noise at our home — or at any other dwelling — can safely be drawn from it.

Calibration of measurement equipment (contrary to IOA GPG section 2.4).

- No calibration certificate is provided in Appendix D for the sound level meter used at NML-5 (RION NL-52, serial no. 164426), nor for the meter (RION NL-52, serial no. 564809) used at NML-8 and NML-10.
- Of the seven calibration certificates supplied in Appendix D, two are duplicates (two certificates each for serial nos. 586940 and 186668), leaving instruments effectively uncertified.
- The Brüel & Kjær Type 4231 calibrator used to check-calibrate the equipment is given no serial number, and no calibration certificate is provided for it. The IOA GPG requires field calibrators to have independent calibration within one year prior to survey completion. Certificates and serial numbers for such calibrators have been provided by the same acoustics consultancy in other applications before the Commission, but not here.
- For the separate Grid Connection baseline survey (Appendix 9-4), no calibration certificates are provided for the sound level meter (serial no. 2818091) or the Brüel & Kjær Type 4231 calibrator. The stated calibration date (November 2023) is more than two years before the survey date (2 December 2025), so the survey was carried out with an instrument whose calibration was out of date, contrary to ISO

1996:2017 section 5.3 — which, on the applicant's own standard, invalidates that survey.

Applying the IOA GPG methodology, these deficiencies render the baseline data from NML-5, NML-8 and NML-10, and from the grid connection survey, invalid.

Monitoring locations, coordinates and photographs.

- In Table 9-6 (Noise Measurement Co-ordinates), nine of the eleven house reference numbers cannot be reconciled with the applicant's own list of sensitive receptors in Appendix 4-1. Where the coordinates are checked, the straight-line discrepancy is approximately 5 km for NML-1 and approximately 4 km for NML-2.
- The house reference numbers assigned to the monitoring locations in Table 9-6 differ from those given for the same locations in Appendix 9-3 (Table 2.1).
- Location photographs are wrong, missing or duplicated: NML-2's photograph is a duplicate of NML-6's; NML-4 has no location photograph at all; NML-8's photograph does not match the assigned house; NML-9's photograph shows equipment in the garden of a different house (H0358) from the one assigned (H0501); and NML-11's photograph is in fact of the house used for NML-10. The IOA GPG (section 2.5.10) requires photographs showing the equipment's position relative to the dwelling.
- The coordinates given for several locations point to the wrong houses — for example, those for NML-9 are the coordinates of H1574, those for NML-10 are the coordinates of H0759, and those for NML-11 are the coordinates of H0501 — so it is not possible to say with confidence which data belongs to which location.
- Appendix 9-3 (section 2.1) contains text referring to "locations B and C" being moved on "20 August 2019" to accommodate cattle. No such locations B or C appear anywhere in this application, and that date is more than two years before this survey was carried out, strongly suggesting that material has been carried over from a different project and casting further doubt on the integrity of the survey record.

Assignment of background noise levels.

- Table 9-13, which assigns representative background noise levels (and therefore the turbine noise limits) to dwellings, again contains incorrect or non-existent house references when checked against Appendix 4-1, and is internally inconsistent with the rest of the chapter as to which location relates to which house. Critically, NML-4 — stated to have the lowest measured baseline and used to set the noise limits applied to "all other locations" — has no location photograph, so its siting cannot be verified at all.

These matters are not merely technical. During pre-application consultation the Commission sought a robust noise assessment, including noise survey results and calibration certificates, and appropriate background noise levels accounting for cumulative effects in accordance with current best-practice guidance (the GPG and ETSU-R-97). In our view the submitted assessment does not adequately meet what was sought.

The baseline survey underpins the derived background noise curves and the site-specific noise limits against which the predicted turbine noise is assessed — including at our own dwelling. If the instruments were not validly calibrated, and if the monitoring data cannot reliably be tied to the correct houses, then those background curves, the noise limits and the resulting conclusions of compliance cannot be relied upon. We ask the Commission to require the applicant to produce complete and valid calibration certificates (including for all calibrators, and for the grid connection survey) together with a corrected, internally consistent survey capable of independent verification; and, given the number and seriousness of these errors, to treat the Noise and Vibration assessment as unreliable and not in accordance with best practice — a matter which, in our submission, weighs against the grant of permission.

Our experience to date with Noise levels generated by Current Faughary Wind Farm has been extremely distressing and unsatisfactory, resulting is significant impacts on the enjoyment of our residential amenity, through sleep disturbance and general noise intrusion. We have also no faith in the Planning Authorities ability or motivation to ensure mitigation measures are enacted appropriately and effectively. We have made numerus submissions to Leitrim County Council regarding this existing development and their continuing failure to meet the noise thresholds set out in their planning grant and associated condition, however no action has been taken. The Development of a further 14 turbines of a significantly larger scale and the cumulative noise impacts will make our lives intolerable at this residential location. (refer to attached latest email to LCC dated- 19th may 2026)

3.4 Inadequate visual impact assessment and photomontage

We have serious concerns about the adequacy of the visual assessment in EIAR Chapter 13 (Landscape and Visual) and Appendix 13.1 (Viewpoint Assessment), specifically in relation to Viewpoint VP8 (L6117 at Gortnacrieve, National Grid Reference 591142, 846128), which is the viewpoint nearest to our own home and the cluster of dwellings around it, and the only representative viewpoint oriented towards Turbine 3.

VP8 is described by the applicant as representative of views "experienced by residents to varying degrees (subject to intervening vegetation) scattered throughout the local landscape" — a landscape that includes our own home. However, the specific point chosen for the camera sits directly behind a section of dense roadside hedgerow. The applicant's own description of the baseline view records that "views towards the proposed project are over a section of hedgerow along an area of agricultural land. Longer range views are generally precluded by this intervening vegetation." As a direct result, neither our home nor the true number and proximity of the residential and farmstead dwellings that share this outlook are visible in the photomontage or wireline model, and the full extent of Turbine 3 — the turbine nearest to our home, at only 875.72 m — cannot be properly appreciated from the image presented.

This is so notwithstanding the fact that the applicant's own figures for VP8 already record a "Medium" magnitude of change and a "Moderate" significance of effect — among the higher rankings of any viewpoint in the assessment. We are concerned that, whether by deliberate

selection or otherwise, siting the camera at a point where incidental roadside vegetation happens to screen the foreground has the effect of understating, rather than accurately conveying, the visual impact on our home and on the wider cluster of dwellings in this locality. We do not accept that a single, substantially screened viewpoint can properly represent the visual experience of the residents living in this cluster, several of whom have unobstructed views of Turbine 3 and the wider array from their own gardens and windows.

We attach below a photograph taken Gortnacrieve [54.359486, -8.140804] opposite our townland of Shasmore, with Saddle hill above our house, which shows the same hillside without the benefit of the screening vegetation relied upon at VP8. That photograph shows:

(i) a turbine already visible at a prominent scale, entirely unobstructed, on the ridgeline — illustrating the true, unscreened visibility that Turbine 3 and the wider proposed array will present from our home and from the surrounding cluster of dwellings; and

(ii) multiple residential and farmstead properties within direct line of sight of the hillside, demonstrating that this is a populated, lived-in landscape rather than the sparsely-occupied countryside suggested by the applicant's chosen viewpoint. We submit that this photograph presents a materially more accurate picture of the existing visual context than the applicant's own baseline photograph and photomontage for VP8.



Figure 1- Photo of 4 no. private residences at Shasmore with Saddlehill in the background.

We also note an internal inconsistency in the applicant's own VP8 documentation: the baseline photograph, cumulative wireline and photomontage record sheets all identify the "Nearest Turbine" as T14, at a distance of 1.8 km, while the narrative assessment in Appendix 13.1 separately states that Turbine 3 — not T14 — is in fact the closest turbine visible from this viewpoint, at approximately 1.7 km, and that it "is the closest and appears most prominently." This inconsistency, on the single viewpoint most relevant to our home, further undermines our confidence in the reliability of the visual assessment as a whole.

We ask the Commission to:

(i) treat the VP8 photomontage and wireline model as an inadequate and unrepresentative record of the visual impact on our home and on the surrounding cluster of dwellings;

(ii) require the applicant to prepare a further, genuinely representative photomontage and wireline view from an unobstructed vantage point that properly shows our property (Residential Receptor 329) and the full visible extent of Turbine 3, together with the other dwellings in this cluster; and

(iii) in the interim, have regard to the photograph we have submitted, which we submit is a truer record of the existing visual context than the applicant's own.

3.5 Turbine T3 — an unacceptable outlier close to homes

Turbine 3 is, in our view, the single most problematic element of the layout, and it is the point at which almost every one of the grounds set out in this submission converges. Whereas the wider array raises the general concerns common to a development of this scale, T3 combines close proximity to homes, an acutely sensitive physical setting, and the greatest concentration of unresolved — and in places wholly unassessed — impacts of any single turbine in the scheme. Even if the Commission were otherwise minded to grant permission for the wind farm in some form, we respectfully submit that T3 and its associated works — its hardstand, cut, access track and drainage — cannot be justified, for the following cumulative reasons, each of which is developed more fully in the section indicated.

- **Proximity and residential amenity.** T3 is the closest turbine to a cluster of dwellings, including our own home at only 875.72 m — barely 4.7 times its own tip height — with several further properties within roughly 1 km of its base. It sits noticeably apart from the main array, projecting out towards these homes, and on any view imposes the greatest residential-amenity burden of any turbine in the scheme. As set out at Sections 2 and 3.1, we both work from home and are exposed to its effects continuously, and this burden falls on a household and community already living daily with the existing Faughary Wind Farm.

- **Shadow flicker.** T3 is not merely the nearest turbine; it is, on the applicant's own turbine-by-turbine modelling (Appendix 10-1), the single greatest source of shadow flicker in the entire scheme — responsible for a worst-case total of 541 hours and

an “expected” total of over 72 hours of flicker across the receptor network, several times more than any other turbine. It is the turbine driving the worst-case totals of between 66 and 85 hours per year recorded at the cluster of dwellings around our home (Receptors 3, 12, 17, 19, 63, 67 and 84). The full flicker case against T3 is developed at Section 3.2.

- **Visual dominance and an unreliable visual assessment.** T3 is the turbine nearest our home and the only proposed turbine towards which the single representative viewpoint for this locality (VP8) is oriented. As set out at Sections 3.4 and 3.9, that viewpoint is substantially screened by incidental roadside vegetation, so that neither our home, nor the cluster of dwellings sharing this outlook, nor the true, unobstructed scale of T3 on the ridgeline, is conveyed by the photomontage relied upon; and the applicant's own VP8 record sheets are internally inconsistent as to whether T3 is even the nearest visible turbine. The visual impact of T3 on this cluster of homes has therefore not been reliably assessed.

- **Peat stability, karst and priority blanket bog.** T3 is sited on the south-western slope of Saddle Hill in upland blanket bog — a priority habitat under the Habitats Directive — at approximately 350–360 m. As set out at Section 3.7, the applicant's own Peat Stability Risk Assessment (Appendix 7-1) and Spoil and Peat Management Plan (Appendix 2-5) leave the stability, drainage and karst behaviour of this ground unresolved, with subsurface karst logged as a live instability factor across the northern site and the stabilising measures deferred to a post-consent design stage not before the Commission. The applicant's own Karst Study (Appendix 7-2) identifies karst concerns of real significance for groundwater and stability at this location.

- **A direct, unassessed pollutant pathway to a European site.** Most seriously, and as set out in detail at Section 3.8, a defined watercourse — omitted entirely from the applicant's surface-water baseline — runs from the vicinity of T3, down the western flank of Saddle Hill, to the Ballagh River and thence to Lough Melvin SAC, a European site that is already failing to achieve good chemical status, is a Drinking Water Protected Area, and is designated for its high-status salmonid interest. T3 is located, on the applicant's own text, within the Ballagh river basin. The construction of T3, its hardstand, cut and drainage on that western flank therefore sits directly above an unmapped and unassessed conduit to a protected and already-impaired water body — precisely the category of pathway that a Water Framework Directive assessment and an Appropriate Assessment must identify before any conclusion of no adverse effect can lawfully be reached.

- **Direct heritage loss and intrusion into a ceremonial landscape.** T3 concentrates the heaviest heritage impacts of the scheme. Its hardstand requires the demolition of the upstanding remains of a possible hut site (CH02), assessed by the applicant at its highest “Very high” magnitude of impact — effective total loss — while its cut and hardstand would also directly affect the lazy beds (CH03); both would be only “preserved by record” (Section 3.11.1). T3 is the nearest turbine, at approximately 146 m, to the ring-cairn (RMP LE008-006001) and cist (RMP LE008-006002) that

together form AH01 on the summit of Saddle Hill, and the applicant concedes that T3 and its hardstand "will interrupt sightlines" between AH01 and the ring-cairn AH110 — two monuments occupying prominent positions within a prehistoric ceremonial landscape (Section 3.11.3). T3 is also, on the applicant's own account, the location of highest archaeological potential, sited in undisturbed bog where sub-surface remains may be especially well preserved, yet it is to be developed on the basis of monitoring alone rather than avoidance or prior testing (Section 3.11.5). We further draw attention to the locally known and unrecorded features on Saddle Hill — the "Seven Rooms" / "Seven Sisters" and the associated folklore — which the applicant's own methodology required to be identified and assessed, and which lie on the very hill on which T3 would be built (Section 3.11.6).

- **Ecology.** The blanket bog and open upland at and around T3 form part of the hen harrier foraging resource whose loss the applicant can only "compensate" for (Section 3.6), and the disturbance and partial loss of this priority habitat is itself an ecological cost that the omission of T3 would avoid.

- **Equestrian activity, horse welfare and rider safety.** The rural local roads serving the western flank of Saddle Hill near our home — including the L6184 and L61801, which form part of the haul and turbine delivery route — are used by us and by others for keeping, exercising and hacking horses. As set out at Section 3.10.7, the construction and delivery traffic associated with the scheme, and with T3 in particular given its proximity to our home, poses a real and unassessed safety risk to horses, riders and handlers on these roads.

T3 is, in short, the turbine at which the proximity to homes, the sensitivity of the receiving environment, and the unresolved and in places unassessed impacts of this development are all at their most acute, and the point at which the application's reliance on deferred design, deferred assessment and after-the-fact mitigation is least able to bear the weight placed upon it. Even if the Commission were minded to grant permission for the remainder of the scheme, we respectfully submit that Turbine 3 and its associated works should not be permitted, given its proximity to homes, its blanket-bog, karst and hydrological setting, the direct pollutant pathway to Lough Melvin SAC, and the heritage loss and intrusion at its hardstand and on the summit of Saddle Hill.

3.6 Ornithology — significant residual effect on hen harrier

Hen harrier is a species of high conservation concern and is protected under Annex I of the Birds Directive. The applicant's own EIAR (Chapter 6) concludes a significant, long-term, negative effect at the national scale for breeding and foraging hen harrier, and in relation to the Leitrim Uplands non-designated important breeding area, before mitigation and compensation. Between one and two breeding pairs have been recorded within the site, with three nests recorded within the site and eight off-site in the study area, and up to about 140 ha of foraging habitat could be lost over the project's life. The Development Applications Unit of NPWS advised that this area has been "a reliable site for one to two pairs of nesting hen harrier over a number of years", and the applicant itself rates the breeding population as of national importance.

Critically, the applicant accepts in its own Table 6-24 that "no additional mitigation [is] available" for this effect — moving turbines or curtailing them at sensitive times was considered and rejected. There is therefore no fallback: the entire case for acceptability rests on "compensation", the last resort in the mitigation hierarchy, and we submit its adequacy and enforceability for a declining, protected raptor are far from certain, for four reasons drawn from the applicant's own documents.

First, the compensation is only an "outline" plan, to be "refined into a detailed Biodiversity Management Plan" after permission is granted rather than before — the wrong way round for a scheme said to make the development acceptable. Worse, the applicant's own documents cannot agree on whether the compensation land is even secured: Chapter 6 describes the land as land that "will be secured" through future legal agreements, while the Outline Biodiversity Management Plan states in one place that land "are secured through legal agreements" (present tense) and elsewhere lists such agreements as something still to be achieved. We ask the Commission to require signed agreements covering the full 218.4 ha for the full 35-year life of the project before any reliance is placed on this compensation.

Second, the core compensation method — converting conifer plantation to open heath and scrub — is unproven at this scale. The applicant's own wildlife consultee, NPWS, warned that "past 'forestry conversion' sites in Ireland and the UK have failed where habitats have become unmanageable as trees have recolonised", and the applicant's own report accepts there will be "a temporal lag between the initial implementation of the proposed compensation measures and full functional delivery" — meaning the harriers could lose their foraging ground years before any replacement habitat is functional.

Third, the headline reassurance of "218.4 ha gained against 140 ha lost" is built on a 140 ha loss figure calculated in ways that minimise it: a 250 m displacement buffer taken from a single study of open, unforested moorland with much smaller turbines (hub heights 30–70 m, against 101–110 m proposed here) and measured from the turbine mast rather than the blade tips, which sweep some 81 m further. Tellingly, the applicant's own worst-case foraging analysis (Appendix 6-12) found that when the actual 2022 hunting range of the harriers was used, all fourteen turbine buffers fell entirely within it, producing no reduction in the loss figure at all — its own data shows the birds ranging across the whole layout.

Fourth, on collision risk, the applicant's own cautious basis (treating casualties as breeding adults, as NPWS specifically advised) produces a 2.31% increase in the regional natural death rate, which the applicant itself admits "is above the 1% threshold" used as a recognised warning sign. It is only by switching to a less cautious assumption — treating casualties as juveniles — that the figure is brought down to 0.56% and presented as a range. We submit that a proposal which openly relies on compensation for a significant residual effect on a protected, declining species, where the compensation scheme is unfinished, contradictorily described, methodologically unproven, and calculated against a flattered loss figure, does not meet the standard required for consent in this sensitive upland location.

We are also concerned that, as the ornithology chapter records, no bird surveys were undertaken for the Grid Connection Route or Turbine Delivery Route accommodation areas, reliance being placed instead on desk study and incidental records, notwithstanding that one working area lies only about 20 m from the Cummeen Strand SPA. We further note NPWS's advice of a possible white-tailed eagle breeding attempt in 2025 within 5–6 km of the nearest turbine, a band the applicant's dedicated eagle surveys (limited to 5 km) did not cover, and that migration-season survey coverage for whooper swans, also an Annex I species recorded on site, only partly captured the autumn and spring migration periods. Given the upland, migratory, transboundary and disturbance sensitivities here, these are material gaps.

3.7 Peat stability, bog-slide risk and increased runoff

The northern part of the site is mapped as blanket peat, with recorded peat depths of up to 4.5 m. The works involve excavation and relocation of an estimated 101,911 m^3 of peat and peaty soil, three borrow pits, crane hardstands and turbine foundations, and ten clear-span watercourse crossings, on and around sloping upland ground, with the Dough / Thur Mountains NHA located upslope and the site hydrologically connected to the Natura 2000 sites at Lough Gill and Lough Melvin. Blanket bog is a priority habitat under the Habitats Directive, and the disturbance of peat on sloping ground carries real risks of instability, bog slippage, drainage impact and siltation, particularly during construction. A previous, far smaller proposal on this same ground (An Dough Windfarm Ltd; eight turbines of 80 m blade-tip height) was refused by An Bord Pleanála on appeal in 2010 (PL.12.234741) on grounds that included the risk of degradation of priority blanket bog, surface-water pollution and slope instability, the inadequacy of the environmental information, and the precautionary principle. The present proposal places turbines of roughly double that blade-tip height, with correspondingly greater foundation loads and excavation volumes, on the same slopes. The burden lies on the applicant to demonstrate, with robust site-specific evidence, that the concerns which grounded the 2010 refusal have been resolved. We respectfully submit that, on the applicant’s own figures and admissions in the Peat Stability Risk Assessment (Appendix 7-1) and the Spoil and Peat Management Plan (Appendix 2-5), they have not.

We do not accept that these risks can be dismissed by the “low to negligible” conclusion the EIAR draws, and we ask the Commission to examine the specialist appendices directly rather than accept the summary in Chapter 7 at face value. Our concerns, drawn from the applicant’s own documents, are as follows.

First, the applicant’s own Factors of Safety are marginal at the most sensitive locations, yet the chapter reports the result as comfortable. The stability analysis expresses results as an Over-Design Factor (ODF), where 1.0 is the minimum acceptable threshold under the Eurocode 7 framework the assessment adopts. The applicant’s own tables (Appendix 7-1, Appendix 2) show several locations clearing that threshold only by a narrow margin: in the loaded construction condition (a 1 m peat surcharge, undrained) the ODF is just 1.1 at Turbine 2 (4.5 m peat), Turbine 4 (2.0 m) and Borrow Pit 1 (3.3 m); and in the long-term drained condition under high groundwater the ODF is just 1.18 at Turbine 4 – between 10 and 18 per cent above the bare minimum, on peat up to 4.5 m deep. The 1.1 result at

Turbine 2 is reached only after the peat's undrained shear strength has been reduced from the site value of 13 kPa to 9.6 kPa to reflect the "very soft" peat logged in trial pit TP42. The assessment's own risk register, moreover, scores the calculated Factor of Safety as a discrete hazard, and at Turbine 4 that line is scored 20 pre-control and 12 post-control – the single highest residual line item in that location's register. The applicant's own register therefore continues to flag stability at the marginal turbines as a high residual risk even after mitigation, which is difficult to reconcile with an unqualified "low risk" characterisation.

Second, the favourable long-term result rests on a hydrological assumption that the applicant's own documents contradict. The sensitivity analysis in the Peat Stability Risk Assessment (Section 5.3) varies the water table only between 0 and 75 per cent of the peat depth, on the stated basis that this is "reasonable due to the steep slopes at the site and the effects of historical drainage." Yet the applicant's own Spoil and Peat Management Plan describes the catotelm – the main body of the peat – as material of "high water content" which "is permanently below the water table (saturated)" (Appendix 2-5, Section 1.2), and moisture contents of up to 1,052 per cent were recorded on site. The "extreme weather" scenario modelled is therefore one in which the bog never becomes more than three-quarters saturated – an assumption at odds with the applicant's own description of the material and with the prolonged frontal rainfall to which these uplands are subject. We ask the Commission to require the applicant to publish the fully saturated case for the marginal locations, since it is that case, and not the 75 per cent cap, that represents the credible worst case for a saturated blanket bog on a slope.

Third, the principal chapter understates the landslide susceptibility recorded in its own appendix. Chapter 7 presents the turbine and substation footprints as mapped "Low" susceptibility with limited exceptions, whereas the Peat Stability Risk Assessment (Table 1) places Turbine 1's hardstand and Borrow Pit 1 in the "High" susceptibility class, with eight further assessment areas in "Moderately High." Where a chapter and its own supporting report diverge on a matter as fundamental as the susceptibility class of the ground beneath a turbine and a borrow pit, that inconsistency is a proper basis for the Commission to treat the chapter's conclusions with caution.

Fourth, subsurface karst is logged as a live instability factor across the northern site and then set aside on the basis of surface avoidance alone. The Peat Stability Risk Register records, at every assessment area from Turbine 1 to Turbine 10, at Borrow Pit 1 and at Temporary Compound 1, the entry "Evidence of subsurface flow: Suspected karst nearby," scored at pre-control values of 16, rising to the maximum of 20 at Turbines 7, 8, 9 and 10, and reduced only to 9 after mitigation. Notwithstanding that the applicant's own register treats subsurface karst flow as a material conditioning factor for peat stability, Chapter 7 concludes that karst risk is "negligible" on the single basis that surface infrastructure avoids mapped karst features with a 30 m buffer. That reasoning does not meet the risk the applicant's own documents record: the hydrological behaviour of the karst system is never established, there is no dye-trace or tracer study, and the pathway by which a peat slide mobilised into a swallow hole would reach the groundwater and surface-water network – precisely the pathway that surface-feature avoidance does not address – has not been assessed.

Fifth, and most fundamentally, the favourable conclusion rests on mitigation deferred to a post-consent "detailed design stage" whose content is not before the Commission. The document is, on its own face, a "planning stage" assessment. Each of its 21 assessment areas reduces its post-control risk rating on the assumption that a future design will be produced and will succeed: the recommendations require the client to "develop design stage Peat Stability Risk Assessment," note that "the geotechnical designer may require additional site investigations to refine the design," and defer the actual stabilising measures – berms, sheet piling and battering – to the construction stage. In other words, the very measures on which the "low" and "negligible" residual ratings depend are promised for a stage after permission, when the Commission will no longer be the decision-maker. This engages the principle in Holohan v An Bord Pleanála (Case C-461/17): an assessment cannot lawfully reach a conclusion of no significant effect on the basis of mitigation whose details are postponed and therefore cannot be evaluated when consent is granted.

Sixth, the deposition of excavated peat into borrow pits is asserted to be incapable of failure, but the operation is itself deferred and the underlying depth data cannot be reconciled. Approximately 101,911 m^3 of peat and peaty soil is to be relocated into these pits, and the applicant claims that placing it "completely below the existing ground profile on all sides" eliminates "any possibility" of a peat-related slope failure. That absolute claim sits uneasily with the record: Borrow Pit 1 is mapped "High" susceptibility, is the only borrow pit whose register records suspected karst, and is the destination for the deepest peat stripped from Turbines 1 to 5, yet the detail of the backfill is expressly deferred to the design-stage assessment. The applicant's own depth inputs also conflict: the Spoil and Peat Management Plan calculates the peat volume at Borrow Pit 1 on a 0.5 m average depth (Table 3-1), while the stability assessment analyses the same location on 3.3 m of peat. The applicant thus treats the same probe data as an overestimate when computing the volume it must manage, and as a design value when demonstrating that the peat is stable.

Seventh, the Spoil and Peat Management Plan is inconsistent with the very assessment it claims to implement. It states that "there are no indications of peat instability on the wind farm site," where the stability assessment records five GSI-mapped peat landslides in the vicinity and scores "evidence of previous slips" at 4 to 5 out of 5 in the Turbine 1, Turbine 2 and Borrow Pit 1 registers. It attributes a low regional landslide risk to "the drained cutaway nature" of the site, when the site is upland blanket bog on a mountain slope and the stability assessment itself locates Turbine 3 "in upland blanket bog." It also gives the contractor different operative instructions from the assessment on the same subjects – on stockpiling (layers to a total 1.5 m thickness, against the assessment's limit of 1.0 m of peat for periods under 8 hours), on movement monitoring (posts where peat exceeds 1.0 m, against the assessment's 2.0 m trigger), and on the total borrow-pit capacity said to guarantee that all excavated peat can be accommodated (298,080 m^3 in the assessment against 248,167 m^3 in the Plan). A contractor cannot comply with both documents, and the Commission cannot know which would govern.

Eighth, the peatland-carbon position is internally contradictory and the carbon released by peat excavation is not quantified anywhere in the EIAR. Chapter 7 asserts that the peat "is not active i.e. not a carbon sink" while elsewhere conceding that excavation "will lead to carbon release, and to the loss of potential carbon storage, due to depletion of the peat bog

carbon sink," stating that this "has been further assessed in Chapter 12 – Climate." It has not: Chapter 12 lists "peat removal" among the activities entered into its carbon assessment, but its construction-phase emissions total of 13,530 tCO_2e contains no quantified figure for the carbon released by excavating, draining and storing the peat itself. This point is advanced narrowly and is not a challenge to the principle of renewable-energy generation; it is a challenge to the completeness of the carbon accounting, and the Commission is entitled to require that figure before it can be satisfied the assessment is complete.

Finally, we remain concerned that extensive new hardstanding, tracks and turbine bases will increase surface-water run-off and reduce the ability of the bog to absorb and slowly release rainfall, increasing flood and siltation risk downslope, and we ask the Commission to require confirmation that the watercourse mapping is complete and accurate, as local knowledge suggests some streams and drains are not shown. Taken together, these are the same concerns – peat instability on sloping blanket bog, the adequacy of the environmental information, and the application of the precautionary principle – that grounded the refusal of the earlier, far smaller scheme on this site in 2010. On a proposal of roughly twice the turbine height, we respectfully submit they are not resolved, that the precautionary principle applies with at least equal force, and that the Commission should require the applicant to remedy these deficiencies and, in their absence, refuse permission.

3.8 Water quality — unmapped watercourse, incomplete baseline and effects on European sites

3.8.1 Summary of our concern

This ground raises a fundamental concern regarding the accuracy, completeness and robustness of the applicant's water environment baseline and, consequently, of the Water Framework Directive (WFD) Compliance Assessment (Appendix 8-1), the surface water data relied upon (Appendices 8-2 and 8-3) and the impact conclusions drawn from them in Chapter 8 (Hydrology and Hydrogeology).

Specifically, at least one clearly defined watercourse that exists on these lands, and is known to us locally, has not been identified, mapped or assessed in the application documents. The watercourse in question passes beneath the R282 regional road and is physically evidenced by a road bridge crossing at approximately latitude 54.350375, longitude -8.145072 (WGS84).



Figure 2- photo at point where water course passes under the bridge on R282 flowing towards Ballagh River.

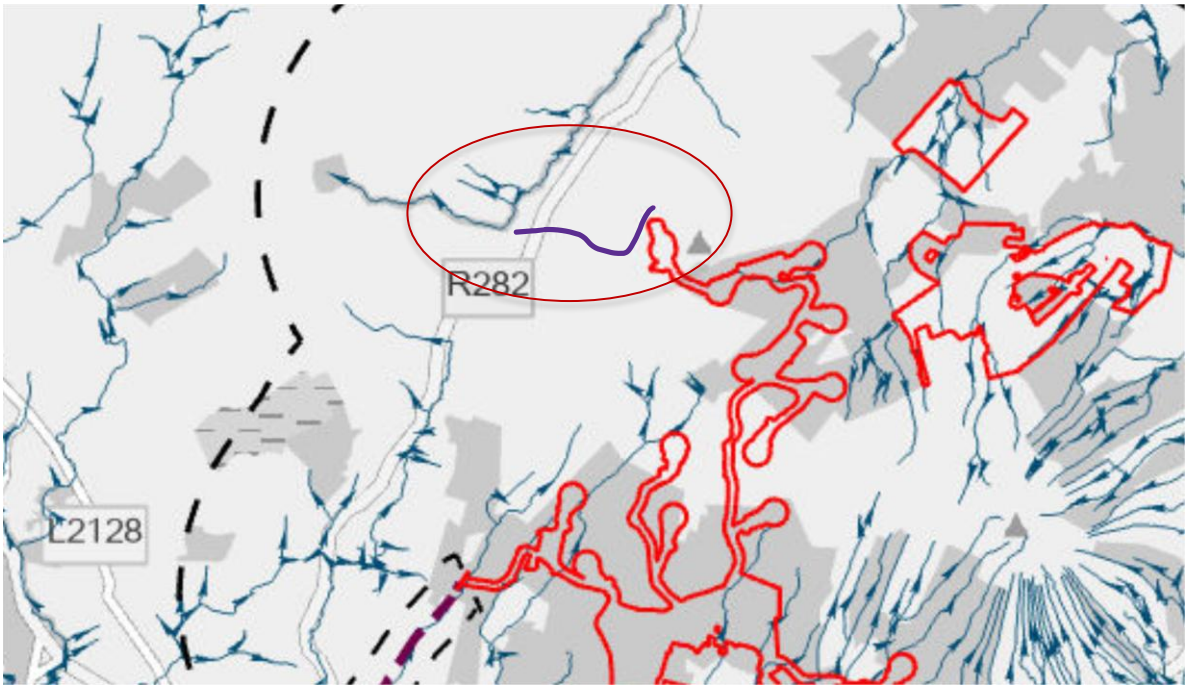


Figure 3- extract from Tobin Drawing 10955-026-GCR-TDR-TOB-D01- indicating WFD water bodies

It can be traced from the vicinity of the proposed turbine location T3, down the western flank of Saddle Hill, to the Ballagh River. The Ballagh River is a principal tributary of Lough Melvin, which is a European site (Special Area of Conservation). This watercourse is, in our direct experience of these lands, the receiving conduit for surface water runoff generated on the western side of Saddle Hill — including the ground on which T3 and its associated access and hardstanding works are proposed.

The significance of this omission is not merely cartographic. The applicant's own conclusions of *"no significant effect"* on water quality and on the Lough Melvin SAC are built upon the pathways that the applicant chose to map. A pollutant pathway that has not been identified is, by definition, a pathway that has not been assessed and for which no located mitigation has been designed. Where that unassessed pathway leads directly to an already-impaired European site, the reliability of the entire assessment is called into question.

3.8.2 A defined watercourse has been omitted from the surface water baseline

Figure 2-2 of Appendix 8-1 ("Regional natural surface water drainage pattern in the environs of the proposed project") and the related surface water mapping purport to depict the drainage network in the vicinity of the proposed development. The watercourse we identify — crossing the R282 at the bridge structure referenced above — does not appear on this mapping, nor is it referenced in the connectivity narrative at Sections 2.1.1 and 2.1.1.1 of Appendix 8-1.

We note that the WFD river network mapped by the applicant reflects the EPA's designated water-body segments and does not, of itself, capture every physical stream, drain or channel on a site. That is precisely the point: reliance on the EPA WFD network alone is not a substitute for a complete, site-specific hydrological survey of all watercourses and drainage features that provide a pathway from the works to a receiving water. A permanent watercourse substantial enough to require a road bridge on a regional road is not a feature that a competent baseline survey should have failed to record. Its absence indicates that the surface water baseline is incomplete, and it undermines confidence that other, smaller pathways have been fully captured.

3.8.3 The omitted watercourse is a direct pollutant pathway to Lough Melvin SAC

The receiving sensitivity of this omission is severe, and it can be demonstrated using the applicant's own text:

- **Turbine T3 is located in the Ballagh river basin.** Section 2.1.1.1 of Appendix 8-1 states expressly: "T3 is located in the Ballagh river basin…"
- **The Ballagh River drains to Lough Melvin.** The same section states that "The Ballagh drains to the northeast and into Lough Melvin, located approximately 5.2 km downstream of the proposed wind farm site."
- **Lough Melvin is hydrologically connected to the site via the Ballagh.** Table 2-6 lists Lough Melvin SAC (Site Code IE00428) at 2.2 km and records it as "Hydrologically connected via the Lattone_010 River and the Ballagh_010 and

associated tributaries." The omitted watercourse is one such tributary of the Ballagh system.

The result is a short, direct and previously unassessed conduit carrying surface water — and any construction-phase sediment or contaminants mobilised on the western side of Saddle Hill in the vicinity of T3 — into the Ballagh River and thence to a European site. This is exactly the category of pathway that a WFD assessment and an Appropriate Assessment are required to identify and evaluate before any conclusion of no adverse effect can lawfully be reached.

3.8.4 The receiving environment is highly sensitive and already impaired

The vulnerability of the receiving environment heightens the materiality of the omission:

- **Lough Melvin is failing to achieve good chemical status.** Table 2-8 of Appendix 8-1 records Lough Melvin (IE_NW_35_160) as "Failing to achieve good" chemical status in the 2016–2021 period, with ecological status only "Moderate." A water body that is already below its objective is subject to the WFD's non-deterioration duty and to the requirement not to compromise the achievement of its objectives.
- **Lough Melvin is a multiply-designated protected area.** It is a Special Area of Conservation, a proposed Natural Heritage Area (Table 2-9), and a lake Drinking Water Protected Area — Appendix 8-1 confirms "Lough Melvin is mapped as a lake DWPA."
- **Lough Melvin is a sediment-sensitive salmonid system.** Appendix 8-1 itself describes Lough Melvin as designated for its "high-status salmonid and other aquatic interests." Salmonid spawning and nursery habitat is acutely sensitive to fine-sediment deposition and smothering of gravels — the very impact pathway the applicant acknowledges at Section 3.1.1 (sediment "smothering of bed materials," gill damage to fish).

3.8.5 The supporting monitoring data is inadequate to characterise this receptor

The concern regarding baseline completeness is compounded by the age and coverage of the monitoring relied upon for the Ballagh system:

- **Biological monitoring in the Ballagh sub-basin ceased 35 years ago.** Table 2-3 shows the Ballagh_010 monitoring station (RS35B010200, "Bridge W. of Tullyskerherny") returning a single Q-value in 1990 (Q5, High) and "ND" (no data) in every subsequent survey year. Appendix 8-1 concedes that "regular monitoring did not occur in the Owenmore (Manorhamilton)_020 or Ballagh_010 WFD River SubBasin, with monitoring ceasing in 1990." The biological baseline for the receiving water is therefore effectively absent.
- **The Ballagh water body is itself "Under Review."** Table 2-5 records the WFD risk status of Ballagh_010 (IE_NW_35B010400) as "Under Review," which — per the applicant's own footnote — means there is insufficient information to determine the

risk. Confidence in any “no deterioration” finding for this water body is correspondingly low.

- **The catchment is demonstrably prone to high sediment mobilisation.** The applicant's own turbidity monitoring (Appendix 8-3) records repeated rainfall-driven turbidity spikes at the monitored surface water locations reaching approximately 350–360 NTU during April–June 2025. This confirms that the local watercourses respond rapidly and strongly to sediment inputs, so construction-phase sediment risk on an unmapped pathway is a real and foreseeable effect, not a remote hypothetical one.
- **The design relies on placement-dependent controls.** The mitigation matrix at Table 4-1 (>50 m buffers, silt fences, check dams, settlement ponds, interceptor drains, level spreaders) and the SWMP's 25 mg/l suspended-solids discharge limit can only function if the pathways they are designed to intercept have been identified. Mitigation cannot be located on, or sized for, a watercourse that does not appear on the applicant's drawings.

3.8.6 Consequences for the WFD Compliance Assessment

The Water Framework Directive (2000/60/EC), transposed by the European Communities (Water Policy) Regulations 2003 (S.I. No. 722 of 2003, as amended), requires that a proposed development must not cause deterioration in the status of a water body and must not compromise the achievement of its environmental objectives. Appendix 8-1 concludes (Table 4-2) with “high confidence” that there will be no such deterioration. That confidence is not sustainable where a material pollutant pathway to the Ballagh_010 water body and to Lough Melvin has been omitted from the assessment. The assessment cannot demonstrate compliance with a non-deterioration obligation in respect of a pathway it has not evaluated.

3.8.7 Consequences for Appropriate Assessment (Habitats Directive)

Under Article 6(3) of the Habitats Directive (92/43/EEC), the competent authority may only grant consent where it has ascertained, on the basis of the best scientific knowledge and beyond reasonable scientific doubt, that the proposal will not adversely affect the integrity of a European site (see *Waddenzee* C-127/02; *Sweetman* C-258/11; *People Over Wind* C-323/17). The Natura Impact Statement and any Appropriate Assessment for this project rely on the connectivity picture presented in the water chapter. If that picture omits a direct hydrological pathway from the works at T3 to the Ballagh River and thence to Lough Melvin SAC, then the assessment does not rest on complete information, reasonable scientific doubt remains, and the Commission cannot lawfully be satisfied that the Article 6(3) test is met on the current documentation. We note in addition that the site is hydrologically connected to Lough Gill SAC, that the Grid Connection Route crosses watercourses within Lough Gill SAC, and that qualifying aquatic species engaged include Atlantic salmon, brown trout, lamprey species, European eel and white-clawed crayfish, together with otter — all of which are sensitive to the sediment and pollution pathways in issue.

3.8.8 Consequences for the EIAR

The EIA Directive (2011/92/EU as amended by 2014/52/EU) requires that the receiving environment be adequately described so that the significant effects of the development can be identified and assessed. A demonstrable omission of a defined watercourse from the water environment baseline is a gap in that baseline. Impact predictions and residual-effect conclusions built on an incomplete baseline cannot be regarded as robust, and the deficiency is capable of affecting the outcome of the assessment for a European site.

3.8.9 Conclusion and relief sought

For the reasons set out above, we respectfully submit that the applicant's water environment baseline and impact assessment are incomplete and cannot presently support the conclusions drawn from them. We request that An Coimisiún Pleanála:

- Require the applicant, by way of Further Information, to undertake and submit a complete site-specific hydrological survey mapping all watercourses, streams, drains and surface-water pathways on and adjoining the site — including the watercourse crossing the R282 at the bridge structure identified above — irrespective of whether they form part of the EPA WFD river network;
- Require the applicant to revise the surface water and connectivity assessment, the drainage design and the mitigation strategy (CEMP/SWMP) to identify, characterise and specifically mitigate the construction-phase sediment and pollution risk along the pathway from T3 and the western flank of Saddle Hill to the Ballagh River and Lough Melvin SAC;
- Require the WFD Compliance Assessment, the Natura Impact Statement and the Appropriate Assessment screening/conclusions to be revisited on the basis of the corrected and complete baseline; and
- In the absence of such information, refuse permission, on the basis that the Commission cannot be satisfied that the development will not cause deterioration of the affected water bodies contrary to the Water Framework Directive, and cannot be satisfied beyond reasonable scientific doubt that there will be no adverse effect on the integrity of Lough Melvin SAC (or Lough Gill SAC) contrary to Article 6(3) of the Habitats Directive.

3.9 Landscape and visual impact

The turbines would be prominent, industrial-scale built elements of up to 185 m extending across Saddle Hill and Dough Mountain within a sensitive upland landscape valued for its scenic and recreational qualities. The study area includes Areas of Outstanding Natural Beauty and the Dartry Mountains, and the applicant’s own assessment records designated scenic views — including V16 (“View of Benbo, Thur and Dough Mountains from the R280”) and V17 (O’Donnell’s Rock) — and recognised walking routes such as the Leitrim Way, which crosses O’Donnell’s Rock, where the turbines would be clearly visible.

The applicant assesses several of these views (for example VP25 and VP26 on the Leitrim Way) as having “Moderate” residual significance, yet characterises them overall as “Not Significant” by treating only “substantial” and above as significant in its own matrix. We respectfully disagree that a moderate, adverse change to protected scenic views and to a recognised long-distance walking route can properly be dismissed as not significant, particularly cumulatively with the existing Faughary Wind Farm on the same hill.

We are also concerned that the photomontages understate the true visual impact, being taken from a limited set of locations and, in places, when trees are in full summer foliage, so that screening is overstated relative to winter conditions. We ask the Commission to view the montages critically and, where possible, to consider the winter, leaf-off situation. In relation to our own home specifically, we raise a further and more particular objection to the adequacy of the photomontage prepared for Viewpoint VP8 at Section 3.4 above.

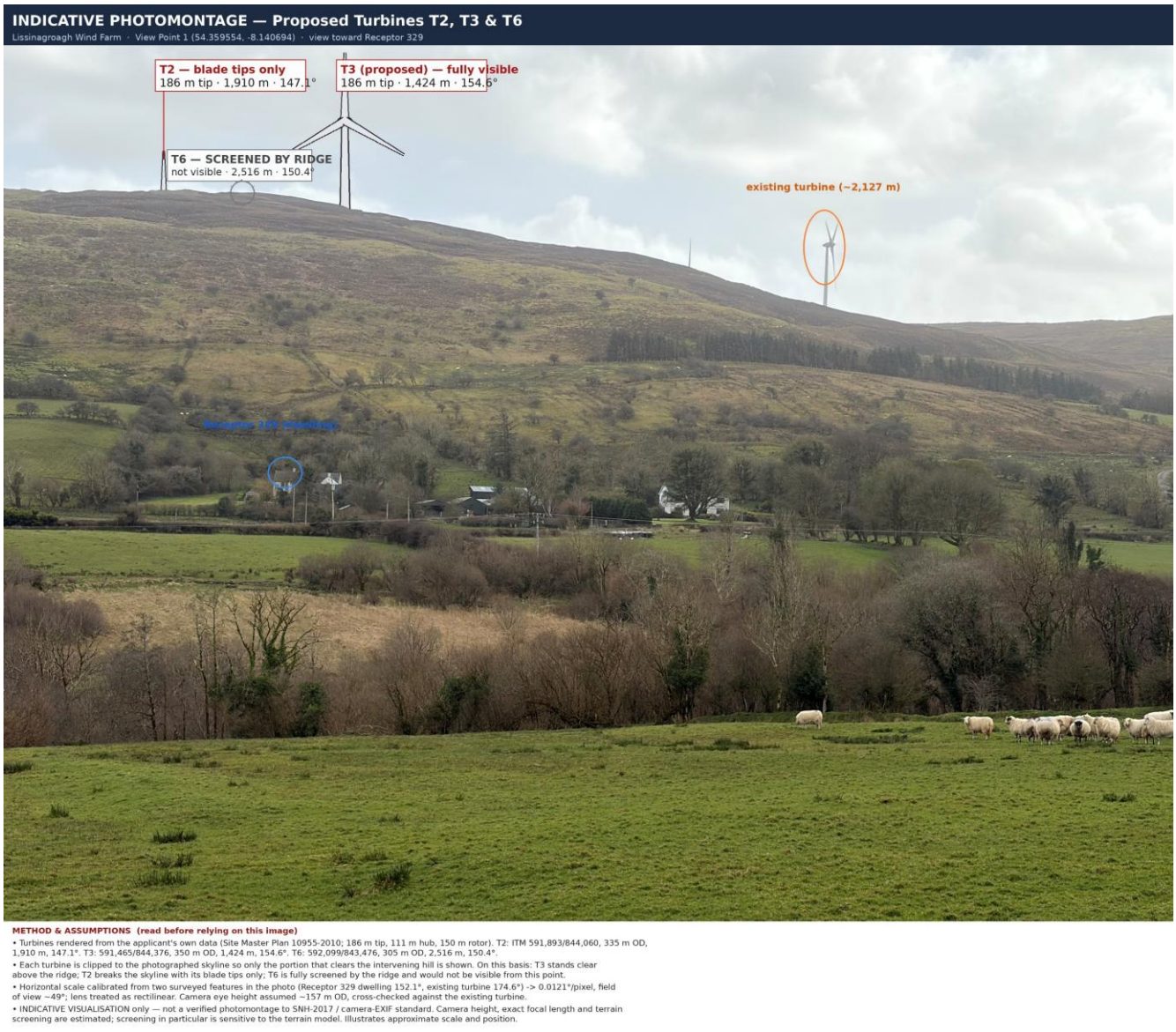


Figure 4- image of Proposed Turbines in un-screened landscape showing actual impact on Residences from VP08.

Figure 4 above, whilst not a fully verifiable view, has been professionally constructed using GPS coordinates and known elevations to illustrate accurately the impact of T3 in particular which is clearly out of scale and context with the rest of the development having a significant impact on the skyline being positioned almost at the crest of Saddle Hill. The impact of T2 & T6 is less as they are partially screened by the ridge line. We would again urge ACP to insist that the applicant represent their verified view with photography taken during the winter months and focused on parts of the landscape where the impacts can be fully appreciated by the residents living in that locality.

3.10 Traffic and impact on rural roads during construction

Construction would generate very substantial heavy-goods traffic on narrow rural local roads (including the L6184 and L61801). Each turbine base alone requires in the order of **1,875 tonnes** (750 cubic meters) of concrete, with far greater volumes of stone fill in addition, along with abnormal turbine-component deliveries. The applicant itself assesses moderate localised residual effects on local roads during construction and decommissioning.

These roads are used by the local community for everyday activities, including exercising and hacking horses, which is incompatible with sustained heavy plant and abnormal-load movements. The Turbine Delivery Route accommodation works would also involve the removal or reduction of roadside hedges, road signs and other features across numerous locations, with associated loss of roadside character and disruption. We do not consider that this level of disruption to a rural road network has been adequately addressed.

Having examined EIAR Chapter 16 (Traffic and Transportation) together with its Appendix 16-1 (Traffic Management Plan) and Appendix 16-2 (Stage 1 Road Safety Audit), we set out below, in more detail, why we do not consider the transport effects of the project to have been adequately assessed. The defining transport feature of the project is the movement of a small number of exceptionally large loads — turbine blades stated at 81.5 m in length, imported as Abnormal Indivisible Loads (AILs) from Killybegs Port in County Donegal via the N56, N15 and N16 national roads, through Manorhamilton town, and approaching the site from the south by the L6184 local road through the townlands surrounding Dough Mountain — over rural roads and through an occupied town centre, at night. Our grounds are confined to matters where, in our respectful submission, the application documents are incomplete, internally inconsistent, or reliant on assessment deferred beyond the point at which the Commission is asked to determine the application.

3.10.1 The defining transport impact of the project — the abnormal loads — is excluded from every quantified assessment

The quantified traffic assessment in Chapter 16 rests entirely on the percentage increase in vehicle movements at four assessment junctions during the morning and evening peak hours. By the applicant's own statement, the AIL deliveries are excluded from that quantified assessment: the note to Table 16-6 records that traffic associated with the delivery of AILs has not been included in the traffic impact percentage increase because the

deliveries will take place at night under traffic control measures with a Garda escort, and Section 16.7.7 confirms that only the standard construction haul trips are carried into the junction assessment.

The consequence is that the single most demanding element of the project — the transport of 112 abnormal loads, including 42 blade deliveries — is never numerically assessed for its effect on the network. It is instead described only in qualitative terms as a "slight", "negative" and "brief" effect at each pinch point. We submit that excluding the defining feature of the project from quantified assessment, on the basis that it occurs at night, does not remove the impact; it removes the assessment of the impact. The effect of moving 81.5 m loads through a town centre and along constrained rural roads is precisely the matter on which the Commission requires a robust evidential basis, and it is the matter the chapter does not quantify.

3.10.2 The applicant's own road safety auditor records that no swept path analysis of the turbine delivery vehicle was provided

Chapter 16 repeatedly asserts, at Sections 16.2.2 and 16.9.2.3, that a swept path analysis of the Turbine Delivery Route was undertaken using the longest component, the 81.5 m turbine blade. The Stage 1 Road Safety Audit at Appendix 16-2, prepared by CST Group on the applicant's own behalf, records the opposite. At item 4.1.2 the audit team states in terms: "No swept path analysis of the turbine delivery vehicle has been provided". The auditors were obliged to proceed on the assumption that a 16.5 m articulated lorry would be used, and even for that very much smaller assumed vehicle they found that the wheel paths cross outside the existing paved roads in places.

There is therefore a direct conflict between the chapter's account of the assessment carried out and the account given by the applicant's own road safety auditor of the material that was actually before the audit team. We do not seek to resolve that conflict, but submit that it is a matter the Commission should require the applicant to address directly, because the swept path of the actual delivery vehicle on the actual route is the foundation on which the deliverability and safety of the entire turbine delivery depends. Until it is produced and verified, the chapter's conclusion that the route can accommodate the loads is not evidenced.

3.10.3 Material Road Safety Audit findings go to viability, and the claim that they were incorporated is not evidenced

Section 16.9.2.4 states that the recommendations of the Stage 1 Road Safety Audit have been incorporated into the scheme design. The audit itself raises seven safety problems, several of which go not to detail but to whether the design works as drawn. At item 4.1.3 the audit team express concern that the dwell areas at the site junctions, stated at a gradient of plus or minus 2.5 per cent, are not viable because the existing road junctions are generally much steeper than this and the drawings indicate no new construction to achieve the stated gradient. At item 4.1.4 the auditors record that it is not clear from the drawings whether the narrow existing tracks are to be widened or used as they are. At item 4.2.3 they find that the visibility splay at Site Accesses 5 and 6 crosses the brow of a hill and that visibility to the right may be restricted.

These are not matters of finish; they go to whether the junctions can safely accommodate the development traffic at all. The chapter's assertion that the recommendations have been incorporated cannot be verified from the documents lodged, because the Road Safety Audit Feedback Form at Appendix B of the audit — the document recording the designer's response to each recommendation and the auditor's acceptance of that response — is referenced but not completed in the issued report. We submit that the Commission should not accept the bare statement of incorporation in the absence of the completed feedback form demonstrating how each safety problem has in fact been resolved.

3.10.4 The passage of abnormal loads through Manorhamilton town centre is understated

The AIL route passes through Manorhamilton, where the speed limit is 50 km/h. Table 16-16 sets out a long sequence of pinch points requiring temporary accommodation works on the N16 through the town itself, including multiple roundabouts — the Station Road roundabout, the Drum Road roundabout and the AbbVie roundabout — together with repeated entries requiring road-edge strengthening, oversail clearance and removal of street furniture along the N16 Manorhamilton road. The chapter characterises the whole of this work as "slight" and "negative", and states that the road-edge strengthening at all pinch points is envisaged to take less than two weeks in total.

We submit that the cumulative disruption of carrying out edge strengthening, sign removal, vegetation cutting and oversail manoeuvres at this number of locations through an occupied town centre — and the residual condition in which the town's verges, signage and street furniture are left — is materially understated by the repeated application of a "slight" and "brief" descriptor to each individual location considered in isolation. The consultation response from Fáilte Ireland recorded in Table 16-1 raised a specific concern about construction traffic in tourism-sensitive areas; that concern is acknowledged in the table but is not carried through into the assessment of effects.

3.10.5 Night-time abnormal load deliveries through occupied areas are not assessed for residential disturbance in any chapter

The applicant has chosen to programme the AIL deliveries for night time: Sections 16.5.2 and 16.5.4 state that turbine deliveries will take place outside normal construction hours, primarily during night time, to take advantage of lower traffic volumes. Chapter 16 offloads the amenity consequences of construction traffic to other chapters of the EIAR. The difficulty is that the night-time movement of these convoys past dwellings is not assessed for residential disturbance in those other chapters either.

Chapter 9 (Noise and Vibration) assesses construction traffic noise only as a change in daytime traffic flow at the same four daytime assessment junctions (Section 9.6.2.12), and separately assesses the noise of the accommodation works themselves (Section 9.6.2.11). It does not assess the noise of the night-time AIL convoys passing residential receptors. This is a significant omission on the chapter's own logic, because Chapter 9 sets a separate and stricter night-time noise limit of 43 dB LA90 — expressly, in its own words, to protect sleep inside properties during the night — and imports a duration test (Section 9.3.2.4) under which a moderate or major impact occurring on ten or more nights in any fifteen, or forty

nights in any six months, constitutes a significant effect. The delivery programme is stated at 23 to 38 delivery events, with up to fourteen turbines deliverable per month, spread over a longer period; that schedule may readily cross the very night-time threshold the applicant has written into its own chapter, yet it is never tested against it.

Chapter 4 (Population and Human Health) does not close the gap. It lists the World Health Organisation Night Noise Guidelines for Europe (2009) among its own guidance documents, but addresses the night-time deliveries only in the context of effect on tourist traffic, concluding that because they occur off-peak and briefly they will not affect tourism; its treatment of the deliveries as they affect residents simply repeats the "slight, negative and brief" conclusion taken from Chapter 16. The result is that the disturbance the applicant has itself scheduled for night time — past occupied dwellings, including those fronting the N16 through Manorhamilton — falls between three chapters, each of which assumes the matter is dealt with elsewhere. We submit this is a failure of the EIAR to assess a likely significant effect of the project, contrary to the requirements of the EIA Directive and the EPA Guidelines (2022).

3.10.6 The alterations to the local road network required for the delivery route have not themselves been assessed for ecology, hydrology or heritage effects

The accommodation works required to move the abnormal loads are not confined to temporary traffic management. On the applicant's own account they involve physical alteration of the road network — road-edge strengthening; the widening, realignment or increased capacity of junctions and bends to accommodate the swept path; the creation or upgrading of dwell areas and site accesses; the possible widening of existing tracks (which the applicant's own road safety auditor, at item 4.1.4, could not even confirm from the drawings); the removal or reduction of roadside hedgerows and boundaries; the cutting back of verge vegetation; and the removal of street furniture and signage. These are themselves works of development, with a physical footprint on the ground and on the roadside environment.

We can find no assessment within the EIAR of the environmental effects of these road-network alterations under the same headings that would apply to any other development works. They are treated in Chapter 16 as a traffic matter and nothing more. In particular:

- **Ecology.** The removal and reduction of roadside hedgerows, boundary vegetation and verges along the delivery and haul routes is not, so far as we can identify, assessed as a loss of linear habitat. Hedgerows and roadside verges are recognised wildlife corridors and nesting, foraging and commuting habitat, including for birds, bats and mammals; yet the accommodation works are not carried into the biodiversity or ornithology assessment. We note that the ornithology chapter itself records that no bird surveys were undertaken for the Turbine Delivery Route accommodation areas.

- **Hydrology.** Road-edge strengthening, junction widening and works at bends affect roadside drains, culverts, gullies and the surface-water runoff regime, and can alter the pathway by which surface water and construction-phase sediment reach receiving watercourses. These works are not carried into the surface-water and

connectivity assessment in Chapter 8, which compounds the baseline-completeness concern we raise at Section 3.8, including in relation to the pathway to the Ballagh River and Lough Melvin SAC.

- **Heritage and landscape.** The alteration of historic road alignments, boundary walls, hedgerows and the character of the streetscape through Manorhamilton and along the rural approach roads has cultural-heritage and landscape implications. These are not assessed in the archaeology, architectural-heritage or landscape chapters, but appear only as temporary traffic accommodation in Chapter 16.

In short, a set of permanent or semi-permanent physical works to the public road network is proposed as an integral and necessary part of the project, without which the turbines cannot be delivered, yet those works are assessed for their traffic effect alone and not for their effects on ecology, hydrology, heritage or landscape. We submit that this is a gap in the EIAR: works that are part of the project must be assessed for all their likely significant effects, not only the traffic effect, and the Commission should require that assessment before the application is determined.

3.10.7 The construction traffic and delivery route pose a particular and unassessed risk to our equestrian activities, to horse welfare and to rider and handler safety

As set out at Section 2 above, we keep horses, and the rural local roads in the vicinity of our home — including the L6184 and L61801 that form part of the haul and turbine delivery route — are used by us and by others in this community for keeping, exercising and hacking horses. This is not an incidental land use: quiet rural roads of this kind are, in practice, the only safe places available to exercise and ride horses in this area, and they are in regular use for that purpose.

Horses are prey animals with a powerful and instinctive flight response. Sudden or loud noise, the movement and vibration of heavy plant, the passage of exceptionally large and slow-moving abnormal-load convoys, night-time activity, unfamiliar machinery, hedge-cutting and vegetation clearance beside the road, and the presence of banksmen, escorts and temporary works are all recognised triggers for a horse to shy, bolt or panic. When that happens on a public road, the consequences are not confined to distress to the animal: there is a real and foreseeable risk of serious injury to the horse, and of serious injury to any rider or handler, and a risk to other road users. Sustained heavy construction traffic and abnormal-load movements are, in our submission, fundamentally incompatible with the safe riding and handling of horses on these same roads.

The risks arise throughout the construction (and decommissioning) period, and are aggravated by the specific features of this project: the volume of standard construction traffic (Chapter 16 quantifies, for example, in the order of 230 heavy vehicle movements on each foundation-pour day); the movement of 81.5 m abnormal loads and convoys along narrow rural roads with which horses and riders must share the network or its immediate margins; the programming of deliveries at night, which removes the predictability on which safe management of horses near roads depends; and the accommodation works themselves (hedge and verge removal, edge strengthening, machinery standing at bends and junctions) at precisely the points a horse and rider must pass.

Notwithstanding this, the traffic assessment in Chapter 16 does not identify equestrians, or vulnerable and non-motorised road users more generally, as a receptor at all. There is no assessment of the effect of the construction traffic, the abnormal-load convoys or the accommodation works on the safe use of these roads by horses and riders, no consideration of the loss of the ability to ride out safely for the duration of the works, and no mitigation directed to that risk. The Population and Human Health chapter, which considers effects on people, likewise does not address it. This is a real, everyday activity for our household and for others in the community, and its exposure to a recognised safety risk over an extended construction period is, in our respectful submission, a likely significant effect that the EIAR has simply failed to identify or assess.

We ask the Commission to require the applicant to assess the effect of the construction and delivery programme on equestrian and other vulnerable road users along the haul and turbine delivery routes, and to identify specific, enforceable mitigation — and, in the absence of an adequate assessment, to treat this as a further respect in which the transport assessment is incomplete.

3.10.8 The conclusion of "not significant" rests on mitigation deferred to a contractor not yet appointed

The conclusion that residual traffic effects are not significant depends throughout on measures whose content is, by the applicant's own account, not yet fixed. The final haul route and the source of quarry material are to be determined on appointment of a contractor (Section 16.5.3). The Traffic Management Plan at Appendix 16-1 is described as a live document to be updated following grant of planning permission and prior to commencement. The diversion routes for the grid connection works rest on a desktop study, with the appointed contractor to liaise with the local authorities to agree suitable routes. Abnormal-load licensing, temporary speed limits, the convoy system and the site-specific temporary traffic measures are all to be developed by the contractor after consent.

We do not suggest that detailed construction-stage method statements must be finalised at application stage. Our submission is narrower: where the assessment of significance itself depends on the efficacy of measures whose content is admittedly undefined and is to be settled only after the Commission has determined the application, the assessment is not one the Commission can presently verify. This engages the principle in Case C-461/17 Holohan, that an assessment cannot lawfully rely on measures whose detail and effect are deferred to a later stage beyond the consent decision. The point is made here as a matter of the adequacy of the environmental assessment of effects, and is consistent with the same concern we raise in relation to peat stability at Section 3.7 and water quality at Section 3.8.

3.10.9 The cumulative assessment is asserted rather than demonstrated, and the traffic and peat chapters are not reconciled on spoil movement

Section 16.12.1 states that a ten-kilometre search of the planning databases identified no committed development of sufficient scale or proximity to give rise to significant cumulative traffic effects. No project is named and no traffic figure is given in support of that conclusion in the body of the chapter. A bare statement that nothing relevant was

found, without identification of what was considered, does not allow the conclusion to be tested.

Separately, the chapter quantifies the import of aggregate and concrete, including the 230 heavy vehicle movements arising on each foundation-pour day, but it does not address the haulage implications of the excavated peat identified in the peatland documentation — which, as we note at Section 3.7, is in the order of 101,911 m^3 of peat and peaty soil. If that material is moved off site, or transported around the internal network, it is construction traffic that does not appear in the daily movement figures at Table 16-7. We submit that the traffic chapter and the peatland chapter should be reconciled on the movement of spoil before the daily and peak traffic figures can be relied upon.

3.10.10 The chapter overstates the completeness of its own assessment

Section 16.2.7 states that no limitations were identified during the preparation of the Traffic and Transport Assessment. That statement sits uneasily beside the absence, on the applicant's own auditor's account, of a swept path analysis of the actual turbine delivery vehicle, and beside the exclusion of the AIL deliveries from the quantified assessment. A comparable statement appears in the noise chapter at Section 9.10, which records that no difficulties or limitations were encountered. We draw the Commission's attention to these statements not as a freestanding ground but because the assertion of complete and limitation-free assessment, made in two chapters that between them do not assess the night-time delivery disturbance, bears on the weight that can properly be given to the chapters' conclusions of no significant effect.

For these reasons, we respectfully submit that the traffic assessment, while competently presented in its treatment of standard construction traffic at the assessment junctions, does not provide the Commission with an adequate basis on which to conclude that the project's transport effects are not significant. The defining transport feature of the project — the night-time movement of abnormal loads through rural roads and an occupied town centre — is excluded from the quantified assessment, is not supported by a verified swept path analysis of the actual delivery vehicle on the applicant's own auditor's account, and is not assessed for residential night-time disturbance, for its effect on our equestrian activities and on vulnerable road users, or for the ecological, hydrological and heritage effects of the road-network alterations it requires. The assessment of no significant effect rests on mitigation deferred to a contractor not yet appointed. We request that the Commission require the applicant to remedy these deficiencies, and that the application not be determined on the present incomplete transport assessment.

3.11 Archaeology and cultural heritage

The proposed development sits within, and immediately adjacent to, a rich and sensitive archaeological, architectural and cultural-heritage landscape. The applicant's own assessment (EIAR Volume II, Chapter 14, and its appendices) records two archaeological monuments within the wind farm site itself — a ring-cairn (RMP LE008-006001) and a cist (RMP LE008-006002), together "AH01" — on the summit of Saddle Hill, 146 m from the nearest proposed turbine (T3); a further 122 archaeological sites or groups of sites within

5 km of the turbines; three National Monuments within 10 km, including the Black Pig's Dyke (AH13; NM No. 653); and a prehistoric ceremonial landscape focused on the northern slopes of Saddle Hill. Having examined Chapter 14 and Appendices 14-3 to 14-6, we do not consider that the effects on this resource have been adequately assessed or given proper weight, for the reasons set out below.

3.11.1 The construction of Turbine 3 and its associated works would cause the direct, permanent loss of upstanding heritage features, which "preservation by record" does not undo

The applicant confirms that construction would directly and permanently affect a number of previously unrecorded cultural-heritage features. These include the upstanding remains of a possible hut site (CH02) within the proposed T3 hardstand; lazy beds (CH03) within the T3 cut and hardstand; the ruinous remains of a building (CH12) within the T6 hardstand and turbine base; the site of a well (CH13) and a further building (CH15) within the T6 hardstand; a lime kiln (CH14) within an access track; a vernacular building (CH18) proposed for demolition adjacent to T9; and drystone walls and a lime-kiln site (CH22, CH23) within proposed borrow pits (Chapter 14, Section 14.4.3). The scale of that loss is confirmed in the applicant's own figures: in the construction-phase assessment (Appendix 14-5), the applicant assigns its highest category, "Very high", to the magnitude of impact on seven of these features — CH02, CH12, CH13, CH14, CH15, CH18 and CH23 — with CH22 assessed as "High". A "Very high" magnitude of impact denotes, on the applicant's own scale, the effective total loss of the feature; yet in every case the residual effect, following "preservation by record", is recorded as no more than "Slight", and in several cases as "Not significant". The applicant's proposed answer to these losses is "preservation by record" — photographic and written survey before destruction. We respectfully submit that preservation by record is not preservation: it documents a feature as it is being removed from the landscape permanently. The chapter itself acknowledges (Section 14.6) that these features "cannot be mitigated" in any real sense once lost. The applicant's own table thus does the very thing we say cannot properly be done: it records the total physical destruction of a heritage feature and then reports the residual effect of that destruction as "Slight" or "Not significant". We ask that this permanent loss of the historic fabric of an upland booleying and vernacular landscape be given proper weight, rather than being treated as neutralised by a survey record.

3.11.2 Direct construction impacts on recorded monuments along the Grid Connection Route are dealt with by monitoring alone

The permanent and direct effects of the project on the recorded archaeological resource are not confined to the turbine footprints and borrow pits. The applicant's construction-phase assessment (Appendix 14-5) records a cluster of recorded monuments — Record of Monuments and Places (RMP) sites — that lie directly within, or immediately adjacent to, the Zone of Notification of the Grid Connection Route, and that would be subject to a "Direct" construction impact. These include the Curraghfore ringfort (AH85, immediately west of the route), the Cloonaquin enclosure (AH123, 34 m), the Boihy ringfort (AH124, immediately east), the Killanummery graveyard (AH127, 39 m), the Killanummery earthwork (AH128, 28 m), the Ballysumaghan enclosure (AH130, immediately west) and

the Kilcoosy ringfort and souterrain (AH131, 17 m). Every one of these is classified by the applicant as of "High" sensitivity, and every one is to be addressed only by "archaeological monitoring … as required and agreed with the National Monuments Service".

This is the same monitoring-rather-than-avoidance approach that we criticise below in relation to Turbine 3 (Section 3.11.5), now applied to a string of seven High-sensitivity recorded monuments along the grid route. We note further that the Turbine Delivery Route passes directly through the Zone of Notification of the Cashelaveela cashel (AH57), a High-sensitivity monument that the applicant's own tables single out as requiring "archaeological testing followed by further mitigation" rather than monitoring alone (Appendix 14-5). Where a linear route is threaded between and across recorded monuments in this way, the residual "Slight" or "Not significant" conclusions depend entirely on the adequacy of a monitoring regime whose findings, by definition, will only emerge once the ground is being opened.

3.11.3 The separation distances relied upon by the applicant are not, in the context of 185 m turbines and extensive groundworks, distances that place the turbines at a "remove" from the monuments

Throughout Chapter 14 the applicant relies on horizontal separation distances to imply that effects on the setting of monuments are acceptable — for example, that AH01 is "146 m to the northeast of the nearest proposed turbine (T3)". We submit that the appropriate separation distance between a wind turbine and an archaeological monument depends on the scale of the development and the context and sensitivity of the heritage receptor, and cannot be judged by plan-distance alone. The turbines proposed here are 180–185 m to blade tip, with hub heights of up to 110.5 m and rotor diameters of up to 163 m (Section 14.2.3.5), and are accompanied by extensive groundworks — turbine bases, crane hardstands, borrow pits, an internal access-road network and associated drainage. A structure standing 185 m tall, sited 146 m from a monument, is closer to that monument than it is high. Nor is AH01 an isolated case: the applicant's operational-phase assessment (Appendix 14-6) records the Faughary ringfort (AH99), also a High-sensitivity recorded monument, as lying only 286 m from the nearest turbine (T11) — again well within the height of the structures proposed. In that context, these turbines and their works are not at a meaningful remove from the monuments of Saddle Hill; they are effectively within, and would dominate, their setting. The applicant's own assessment concedes that the T3 turbine and hardstand "will interrupt sightlines" between AH01 and the ring-cairn AH110, two monuments occupying "prominent positions" on the summits of Saddle Hill and Crocknagaple Hill (Section 14.4.4). We do not accept that so direct an intrusion into a prehistoric ceremonial landscape is properly characterised as no more than "moderate" and therefore "not significant".

3.11.4 The applicant's methodology classes even its highest-value effects as "not significant", which does not withstand scrutiny for a National-Monument and ceremonial-landscape context

Under the applicant's own criteria (Table 14-3), National Monuments and monuments subject to Preservation Orders are of "Very High" sensitivity, and all Record of Monuments

and Places sites and previously unrecorded archaeological sites are of "High" sensitivity. Yet the residual-effects table (Table 14-14) assesses every single setting effect — including on AH01, on the Black Pig's Dyke National Monument (AH13; NM No. 653), and on the entire Saddle Hill ceremonial landscape (AH01, AH03, AH04, AH110) — as no greater than "moderate". The chapter then defines "moderate" as below the threshold of significance in EIA terms (Section 14.2.3.3). The breadth of this outcome is striking when the appendices are read as a whole: across the entire heritage dataset assessed in Appendices 14-5 and 14-6 — some 137 archaeological receptors, together with all of the built-heritage and cultural-heritage receptors and the historic demesnes — the highest significance of effect returned anywhere, at either construction or operational phase, is "moderate", and every single "moderate" effect is in turn recorded as "not significant". On the applicant's own assessment, therefore, not one heritage receptor, at any level of sensitivity, produces a "significant" effect. Two features of the tables show how that result is reached. First, and most starkly, the seven cultural-heritage features assessed at "Very high" magnitude of impact — that is, effective total loss (Section 3.11.1 above) — are returned as only "moderate" and "not significant" solely because those features are classified as of "Low" sensitivity; the classification, not the physical reality of destruction, drives the result. Second, sensitivity offers no protection at the other end of the scale either: the Black Pig's Dyke (AH13), a National Monument of "Very high" sensitivity, is returned as "moderate" and "not significant", and the remaining "Very high" sensitivity receptors in the study area — including the two further National Monuments recorded in Appendix 14-6, the house at Laghty Barr (AH132; NM No. 508) and the Corracloona megalithic tomb (AH133; NM No. 405) — are each returned as "Slight" and "not significant". We note, in addition, what appears to be an internal inconsistency in the sensitivity ratings themselves: the Cornastauk ringfort (AH122; RMP LE011-008) is classified in Appendix 14-5 as of "Very low" sensitivity, notwithstanding that it is a recorded ringfort and that Table 14-3, on the applicant's own account, treats all Record of Monuments and Places sites as of "High" sensitivity — a classification difficult to reconcile with that methodology. The practical result is that a scheme placing 185 m turbines into the setting of a recognised prehistoric ceremonial landscape, and interrupting inter-visibility between its monuments, is reported as having no significant heritage effect at all. We submit that a methodology which cannot return a "significant" effect even in these circumstances — whether the impact is the total loss of a feature or an intrusion into the setting of a National Monument — is, in this respect, calibrated so as to understate impact, and that its conclusions should be treated with corresponding caution. We further note that the applicant's Zone of Theoretical Visibility mapping is a "bare-earth model" that takes no account of screening (Section 14.4.4); given that much of the existing coniferous forest would be felled to construct the wind farm, the visual relationship between the turbines and these upland monuments is likely to be more open, not less, than the assessment assumes.

3.11.5 The area of highest archaeological potential is being developed on the basis of monitoring alone, not avoidance

The applicant accepts that Turbine 3 has "a higher potential for sub-surface archaeological remains to be present", being within 146 m of AH01 and within 1.5 km of several prehistoric ceremonial sites, and that it is sited in undisturbed rough pasture and bog

rather than in previously forested ground (Section 14.4.3). This is the same location at which the applicant's own construction assessment records the total loss of upstanding remains: the possible hut site CH02 within the T3 hardstand is assessed at "Very high" magnitude of impact, and the lazy beds CH03 within the T3 cut and hardstand are also directly affected (Appendix 14-5). The chapter also acknowledges that, because of the preserving conditions within bogs, any sub-surface archaeological features there may be especially well preserved, and that pre-mitigation effects at such locations may range up to "significant". Despite this, the applicant states that T3 is "not suitable for archaeological test trenching" and would instead be subject only to archaeological monitoring during topsoil stripping (Section 14.5.2). We are concerned that the location most likely to contain significant, well-preserved archaeology — and which already contains upstanding remains assessed for total loss — is to be investigated only as the ground is being opened for construction, at a point when the design is fixed and the practical options are limited to recording or removing whatever is found. This is avoidance in name only, and reinforces our request (Section 4 below) that Turbine 3 and its associated works should not be permitted.

3.11.6 The baseline omits locally known features and cultural associations on Saddle Hill, and the field survey was itself acknowledged to be incomplete

The applicant's own methodology treats "previously unrecorded archaeological sites" as of High sensitivity and expressly includes intangible cultural heritage and folklore within the scope of assessment (Table 14-3; Section 14.3.8). Against that standard, we draw the Commission's attention to locally known features and associations on Saddle Hill that do not appear to have been recorded or assessed. First, there are several unrecorded features on Saddle Hill in the form of shallow caves or chambers known locally as the "Seven Rooms" or "Seven Sisters". Local folklore associates these chambers with monks' cells used in medieval times and connected to St Mogue's (Rossinver). Second, according to local folklore surrounding the 17th-century conflict, Sir Frederick Hamilton — the founder of Manorhamilton, whose castle and associated structures form part of the recorded heritage of the study area (AH73) — is said to have constructed a secret escape tunnel from his castle reaching the foothills of Saddle Hill, allowing his escape towards Enniskillen. We record these as local tradition rather than as established fact; but the applicant's own methodology requires exactly such traditions, and any physical features underlying them, to be identified and assessed. Their absence from Chapter 14 is a gap in the baseline. This concern is heightened by the applicant's own admission (Section 14.3.12) that the density of the coniferous forest prevented physical access to parts of the site during field inspection, including the recorded features CH13 and CH23. Where the survey could not reach the ground, the absence of a record cannot be treated as evidence of absence of archaeology. We ask that these features and associations be properly investigated before any determination, particularly given their location on the very hill on which Turbine 3 and its works would be constructed.

3.11.7 Conclusion on archaeology and cultural heritage

Taken together, the applicant's own chapter and appendices record the permanent loss of upstanding heritage features — several assessed at the maximum "Very high" magnitude of

impact — the intrusion of 185 m turbines and extensive groundworks into the setting of a National Monument and a prehistoric ceremonial landscape, direct construction impacts on a string of High-sensitivity recorded monuments along the Grid Connection Route, an assessment methodology that returns no significant heritage effect anywhere across some 137 receptors regardless of sensitivity, reliance on monitoring rather than avoidance at the location of highest archaeological potential, and a baseline that omits locally known features and cultural associations on Saddle Hill and that was acknowledged to be incomplete on the ground. We ask the Commission to give these matters proper weight, to require that the omitted features and associations be investigated before any determination, and to treat the loss of, and the effect on the setting of, these monuments and features as a material reason for refusal, or at the least as a further reason why Turbine 3 and its associated works should not be permitted.

3.12 Design flexibility and uncertainty in the assessment

The application seeks design flexibility (An Coimisiún Pleanála opinion reference **ACP-323910-25**) so that the turbine tip height (180–185 m), rotor diameter (149–163 m) and hub height (101–110.5 m) are not fixed, with the final turbine model selected only at procurement stage. We are concerned that this level of flexibility undermines the certainty of the visual, noise, shadow flicker, ornithology and collision-risk assessments, because the actual machines built could sit at the more impactful end of the envelope. We also note an apparent internal inconsistency in the design envelope, with the noise assessment referring to a lower tip height (about 179.5 m) than the 180–185 m range stated elsewhere.

A resident cannot properly understand or respond to the true impact of a development whose key dimensions and positions remain adjustable. We ask the Commission to treat this uncertainty as a reason for caution, and to require that any assessment relied upon reflects the genuine worst case across the full flexibility envelope.

This uncertainty is compounded by a wider concern about the reliability and neutrality of the way the application has been presented. As set out at Sections 3.4 and 3.9, the visual assessment is, in our submission, ambiguous and unreliable: the single representative viewpoint for our locality (VP8) is substantially screened by incidental roadside vegetation, so that neither our home nor the surrounding cluster of dwellings appears in it; the applicant's own VP8 record sheets are internally inconsistent as to which turbine is nearest and most prominent; and the photomontages more generally are taken from a limited set of locations and, in places, in full summer foliage, so that screening is overstated and the true visual impact understated. Taken together, these features leave the visual case incapable of being relied upon as an accurate representation of what residents would actually experience.

Our concern extends further, to the base mapping and cartography on which the application and its figures are constructed. In our direct experience of these lands, the base mapping utilised throughout the application is vastly outdated and, we submit, has the effect — and gives every appearance of being a deliberate attempt — of illustrating a barren and largely uninhabited upland landscape, wherein the proposed development could be presented as having minimal impact. The mapping omits long-established

residential properties and farms that have stood in this locality for many years and that would plainly be affected by the development; and, most significantly, it omits the adjacent, already-constructed Faughary Wind Farm on the same hill. The omission of long-established homes and farms, and of an existing operational wind farm immediately beside the site, is not, in our respectful submission, a trivial cartographic oversight. It is a deliberate attempt to confuse and disorientate the viewer, to understate both the populated, lived-in character of this landscape and the existing turbine development already within it, and thereby to mislead the Commission in its assessment of this application.

These are not isolated presentational failings. The same base mapping, and the same understatement of the receiving environment, underpin the figures, viewsheds, zones of theoretical visibility, connectivity diagrams and receptor identification relied upon throughout the EIAR and its associated specialist reports. Where the foundational representation of the landscape omits existing homes, farms and an operational wind farm, and depicts the setting as more barren and empty than it is, that defect necessarily taints the findings built upon it — including the landscape and visual assessment, the cumulative assessment (which must properly account for the existing Faughary turbines), the population and human health assessment, and the shadow flicker, noise and heritage assessments that all depend on a correct identification of the receptors present. We ask the Commission to treat the outdated and, in our submission, misleading base mapping as a matter going to the reliability of the application as a whole, and as a further reason why the assessment cannot presently be relied upon to grant permission.

3.13 Project splitting — wind farm and grid connection

The documentation indicates that the wind farm and elements of the associated 110 kV grid infrastructure may be progressed through separate consenting processes, while the EIAR presents itself as assessing the "entire project". The wind farm cannot function without its grid connection. We are concerned that separating the two risks a fragmented environmental assessment and could prejudice a proper, whole-project understanding of cumulative effects. We ask the Commission to ensure that the project is assessed as a whole and that this does not result in the salami-slicing of environmental effects.

3.14 Transboundary effects

The site lies only about 3 km from the Northern Ireland border, and the application itself acknowledges the potential for significant transboundary effects. Concerns have been raised regarding effects within the Fermanagh and Omagh District Council area and the engagement of transboundary EIA requirements, including in relation to Lough Melvin ASSI, which is hydrologically connected to the site. We ask the Commission to ensure that transboundary consultation and assessment obligations are fully and transparently discharged.

3.15 Over-reliance on future mitigation, compensation and post-consent control

A theme runs through the whole application: significant effects are identified and then addressed by promises of future mitigation (shadow flicker curtailment; water-quality controls), compensation (hen harrier), design flexibility (turbine selection) and post-consent management plans, all assumed to operate perfectly for the life of the development. We submit that where the acceptability of a development depends so heavily on future, off-stage performance rather than on avoidance of harm by design, the Commission cannot have the certainty required to grant permission. The correct response, in our respectful submission, is refusal.

3.16 Public engagement

We also record our concern that community engagement in advance of the application was, in our experience, limited, with restricted public meetings and reluctance to engage directly with affected residents. This has made it harder for the community to understand and respond to a development of this scale in the time available.

3.17 Environmental cost of construction versus stated benefits

Finally, we submit that the stated climate and renewable-energy benefits must be weighed honestly against the environmental cost of building this development: the disturbance and partial loss of carbon-storing bog, the excavation of over 100,000 m^3 of peat, the borrow pits, extensive new roads and hardstanding, and the embodied carbon of large-scale concrete and steel construction. We do not accept that the environmental case has been presented in a balanced way, and we ask that the true carbon and ecological cost of construction be fully accounted for.

4. Conclusion and request

For the reasons set out in detail above, we respectfully request that An Coimisiún Pleanála REFUSE permission for the proposed development. Our grounds are drawn very largely from the applicant's own documents, and together they establish, in our submission, that the application does not provide the certainty required to grant consent. In particular we rely on: the unacceptable cumulative loss of residential amenity to a dwelling only 875.72 m from Turbine 3, experienced continuously by a household that works from home and already lives with the existing Faughary Wind Farm (Sections 3.1 and 3.2); the applicant's own shadow flicker modelling, which predicts flicker far in excess of its own thresholds at our home and at dozens of others, and then relies on an unaudited, self-administered curtailment regime to suppress it for 35 years (Section 3.2); a Noise and Vibration assessment so affected by calibration, location, coordinate and data errors that it is, in our submission, unreliable and not in accordance with best practice (Section 3.3); a visual assessment whose key viewpoint understates the impact on our home and cluster of dwellings, resting on outdated and, in our submission, misleading base mapping that omits long-established homes and farms and the adjacent Faughary Wind Farm (Sections 3.4, 3.9 and 3.12); the concentration of unresolved and in places wholly unassessed impacts at

Turbine 3 (Section 3.5); the significant residual effect on protected hen harrier that the applicant can only "compensate" for, through a scheme that is unfinished, contradictorily described and methodologically unproven (Section 3.6); the peat-stability, bog-slide and karst risks on sloping blanket bog — on the very ground on which a far smaller scheme was refused in 2010 (Section 3.7); the omission of a defined watercourse forming a direct, unassessed pollutant pathway from Turbine 3 to Lough Melvin SAC, with consequences for the WFD Compliance Assessment, the Natura Impact Statement and the Appropriate Assessment (Section 3.8); the exclusion of the defining transport impact — the night-time movement of 81.5 m abnormal loads through rural roads and an occupied town centre — from any quantified assessment, and the unassessed risk to our equestrian activities and to other vulnerable road users (Section 3.10); the permanent loss of upstanding heritage features and the intrusion of 185 m turbines into the setting of National Monuments and a prehistoric ceremonial landscape (Section 3.11); and, running through the whole application, a pervasive reliance on future mitigation, compensation, design flexibility and post-consent management, rather than the avoidance of harm by design (Sections 3.12 and 3.15).

At the very least, and even if the Commission were minded to grant permission for the remainder of the scheme, we ask that Turbine 3 and its associated works not be permitted. As set out at Section 3.5, T3 is the point at which almost every one of our grounds converges: it is the closest turbine to our home and to a cluster of dwellings; it is the single greatest source of shadow flicker in the scheme; it sits in priority blanket bog on a karst-influenced slope; it lies directly above the unmapped watercourse that forms a direct pollutant pathway to Lough Melvin SAC; it would destroy upstanding heritage features and intrude upon the setting of the recorded monuments on the summit of Saddle Hill; and it is being advanced, at the location of highest archaeological potential, on the basis of monitoring rather than avoidance. Its refusal would remove the most acute and least-resolved impacts of the entire application.

We would be grateful to be kept informed of the progress of this application and of any oral hearing. We confirm that the €50 fee accompanies this submission.

Yours faithfully,





IAN & ANGELINE PUDNEY

Appendix 1

Email to LCC re: Noise levels associated with Faughary wind farm

Outlook

Planning Enforcement Section - Leitrim County Council

From Ian Pudney <ianpudney@hotmail.com>
Date Tue 19/05/2026 20:52
To planning <planning@leitrimcoco.ie>

Ian & Angeline Pudney

Shasmore
Rossinver
Co. Leitrim

F91 DFT0

19th May 2026

Re: Wind Farm Development Permitted under Planning References P.04/550 and P.11/207 – Persistent Noise Nuisance and Breach of Planning Condition 7

Dear Sir / Madam,

I write to formally raise a complaint regarding the persistent and intolerable noise nuisance arising from the wind farm development permitted under Planning Register Reference P.04/550, as subsequently amended under P.11/207.

The operation of this development is having a severe and ongoing impact on the residential amenity of our dwelling at Shasmore, Rossinver. The noise generated by the turbines, particularly during evening and night-time periods, is clearly audible from within our home and is causing significant disturbance, sleep disruption, and loss of amenity .

Condition 7 of permission P.04/550 specifically requires that:

> "At the critical wind speed…the noise from the proposed development shall not, when measured externally at the nearest occupied house, exceed 45 dB(A) Leq when measured over any five minute period."

The condition further states that where the prescribed limits are exceeded, "the wind farm operation shall be stopped until written agreement is reached with the planning authority on design or operational alterations intended to reduce the noise accordingly."

We contend that the current operation of the development is in clear contravention of this condition and is materially inconsistent with the representations and compliance submissions made by Gaelectric Developments Ltd. to Leitrim County Council on 16 June 2015. In that correspondence, Gaelectric asserted that:

> "noise levels associated with the operation of the turbines have been compared against the relevant planning criteria and it is concluded that turbine noise emissions do not exceed the limit values."

Subsequently, an internal memorandum of Leitrim County Council dated 30 June 2015 recorded that the submitted monitoring exercise "concludes that turbine noise emissions do not exceed the limit values specified in the condition."

However, the lived experience at our dwelling is entirely inconsistent with these conclusions. The audible turbine noise, particularly during quieter night-time conditions, is intrusive, persistent and incompatible with reasonable residential amenity expectations in a rural environment.

We also note that the Wind Energy Development Guidelines 2006 identify the importance of protecting nearby residents from sleep disturbance and excessive noise impacts. The guidance recognises that a fixed limit of 43 dB LA90 is intended to protect sleep within properties during the night-time period. The current operation of the development appears fundamentally at odds with those objectives.

Furthermore, the thresholds set out under Condition 7, together with the subsequent compliance surveys undertaken by Gaelectric Developments Ltd., do not appear to adequately consider the particular topographical characteristics of the valley landscape surrounding the development, nor the influence of prevailing wind conditions which frequently channel and amplify turbine noise across the area. In practice, these combined factors significantly intensify the audibility and impact of turbine noise at certain residential locations, including our dwelling at Shasmore. As a consequence, dwellings situated in excess of 1 kilometre from the development are experiencing noise impacts that are substantially greater, and more intrusive, than those which might ordinarily be anticipated based solely on separation distance or standard predictive modelling. This raises serious concerns regarding the robustness and representativeness of the original noise assessments and compliance monitoring undertaken for the development.

In addition, we are particularly concerned that the elevated and persistent baseline noise environment generated by the existing development may materially distort and undermine the assessment of cumulative noise impacts associated with the proposed Lissinagroagh Wind Farm development currently under consideration by An Coimisiún Pleanála.

As outlined in established professional industry guidance, cumulative assessment becomes fundamentally compromised where existing wind farm noise already approaches or exceeds accepted thresholds, and notes that where existing wind farms are marginally compliant with the 2006 Guidelines, cumulative noise impacts from additional developments become critically significant.

In light of the above, we respectfully request that Leitrim County Council, through its Planning Enforcement Section:

1. Undertake an independent investigation into the operational noise emissions arising from the wind farm;
2. Carry out independent night-time noise monitoring at our dwelling and other affected residential properties;
3. Assess compliance with Condition 7 of planning permission P.04/550;
4. Consider enforcement action where non-compliance is identified; and
5. Ensure that any future cumulative noise assessment associated with the proposed Lissinagroagh development properly accounts for the actual operational noise environment currently being experienced by local residents.

We would appreciate an acknowledgement of this complaint and confirmation of the steps the Planning Authority intends to take in response.

Yours faithfully,

Ian & Angeline Pudney

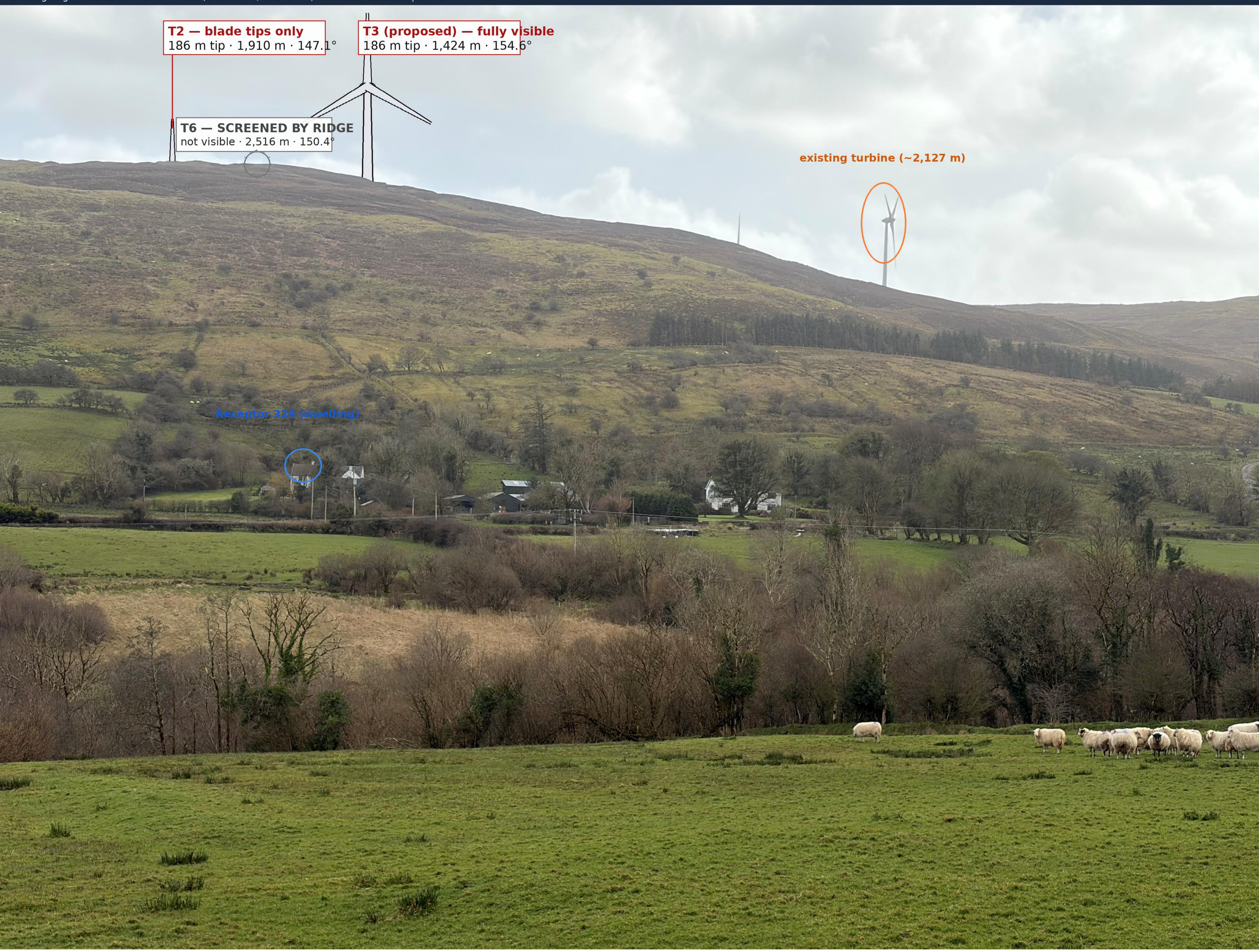
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Appendix 2

Photo Montage of T3 clearly illustrates impact on our Residential Amenity.

INDICATIVE PHOTOMONTAGE — Proposed Turbines T2, T3 & T6

Lissinagroagh Wind Farm · View Point 1 (54.359554, -8.140694) · view toward Receptor 329



METHOD & ASSUMPTIONS (read before relying on this image)

• Turbines rendered from the applicant's own data (Site Master Plan 10955-2010; 186 m tip, 111 m hub, 150 m rotor). T2: ITM 591,893/844,060, 335 m OD, 1,910 m, 147.1°. T3: 591,465/844,376, 350 m OD, 1,424 m, 154.6°. T6: 592,099/843,476, 305 m OD, 2,516 m, 150.4°.

• Each turbine is clipped to the photographed skyline so only the portion that clears the intervening hill is shown. On this basis: T3 stands clear above the ridge; T2 breaks the skyline with its blade tips only; T6 is fully screened by the ridge and would not be visible from this point.

• Horizontal scale calibrated from two surveyed features in the photo (Receptor 329 dwelling 152.1°, existing turbine 174.6°) -> 0.0121°/pixel, field of view ~49°; lens treated as rectilinear. Camera eye height assumed ~157 m OD, cross-checked against the existing turbine.

• INDICATIVE VISUALISATION only — not a verified photomontage to SNH-2017 / camera-EXIF standard. Camera height, exact focal length and terrain screening are estimated; screening in particular is sensitive to the terrain model. Illustrates approximate scale and position.