LISSINAGROAGH WIND FARM AND GRID CONNECTION

Observation Submission

To An Coimisiún Pleanála
Date: 15 October 2026

Submitted by

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Grid application: VA12.324597 / ACP-324597-26
Related wind farm: PAX12.324290 / ACP-324290-26
Grid pre-application: VC12.323353 / ACP-323353-25

Grid development site address and townlands

Proposed 110 kV substation at Faughary, Co. Leitrim, and underground grid connection to the existing
Srananagh substation, Co. Sligo.

County Leitrim: Curraghfore, Skreeny, Faughary, Amorset, Clooneen, Milltown, Cornastauk, Srabrick,
Cloonaquin, Carrigeencor, Boihy, Aghameelta, Kilcoosy, Corrudda, Cleen, Tully, Killeen, Killanummery,
Cleighran, Fawn, Drumahaire, Drumlease and Carrowcrin.

County Sligo: Lavally, Drumee and Ballysumaghan.

Requested determination: refusal

I request refusal of the proposed grid connection and permanent substation, and refusal of the related wind
farm on the complete-project grounds set out in this submission. I request that this observation be placed on
both case files and brought expressly to the attention of both Inspectors and case teams.
This submission contains my detailed grounds, maps, photographs, cross-border correspondence and
examination of TOBIN's responses dated 9 and 25 September 2026.

Contents and reading guide

Part A - Purpose, complete-project grounds and examination of TOBIN’s responses

Part B - Photographic evidence: sand martin nesting bank, cliff, access road and surrounding landscape

Part C - Detailed grounds, engineering review, maps and earlier photographic evidence

Part D - Northern Ireland correspondence and TOBIN’s notification

Final determination requested: refusal of the Grid Planning Application

References to TOBIN page numbers mean the printed page numbers in the response dated 9

September 2026 unless otherwise stated. Earlier section and source-page references are retained so the underlying material remains identifiable. The continuous page number at the foot of this volume identifies its current pagination.

Local observations are identified as such. Where I challenge the adequacy of investigations, I do not present untraced groundwater routes as scientifically proven. I request that the Commission obtain and examine the relevant applicant records rather than treat gaps in the evidence as proof that effects are absent.

1. Purpose and basis of this initial section

The purpose of this initial section is to examine TOBIN’s two response documents against the evidence in the EIAR and NIS. These responses present the applicant’s answers to concerns raised by prescribed bodies and third parties and rely on specific report sections to justify the adequacy of the assessments.

I use TOBIN’s own statements and references to identify omissions, inconsistencies and conclusions insufficiently supported by the underlying investigations. Each finding concerns the complete project: turbines, access roads, passing bays, borrow pits, grid connection, substation, 100 m meteorological mast and 23 m telecommunications mast.

This examination challenges the reliability of the shared EIAR and NIS and their adequacy as the evidential basis for determining the applications. The documented findings support my request for refusal. My existing wind farm objection remains in place; this observation also examines how those studies support the later grid application.

The applicant’s response states that it addresses all matters raised, while explaining that it responds where it considers a response warranted. That assurance must be tested against the actual concerns and evidence, not accepted as a substitute for doing so.

Source: TOBIN, 9 September 2026, §§1.1-1.2; cover letter dated 9 September 2026; Part 2 response dated 25 September 2026.

2. One project and the first complete-project failure

TOBIN acknowledges that the wind farm and grid connection are linked applications relating to a single project. Separate statutory applications do not divide the physical effects or the responsibility to assess them together.

The central failing concerns whether the studies adequately assessed all identified infrastructure and its connected receiving environment. As component locations

changed or became defined, survey coverage needed to address their actual footprints, adjoining habitats, affected homes, drainage and groundwater pathways.

The application boundary, ecological survey boundary and each topic’s Zone of Influence are different. I do not contend that every discipline must adopt one identical buffer. I contend that each must explain and substantiate its coverage against the final works and relevant pathways, including connected ground outside the application boundary.

This concern extends along the grid route. A road corridor or trench footprint does not itself establish the extent of effects on adjoining bog, springs, karst, hedgerows, bridges or downstream waters.

Source: TOBIN §2.2.4; notification to Fermanagh and Omagh District Council, 12 May 2026, p. 2; detailed Part C, study-area map plates.

3. Grid material, borrow pits and the shared construction area

The grid application identifies the wind farm borrow pit arrangements as a destination for excavated grid material, as set out in the detailed material-management grounds. Neither TOBIN response identified in this review provides the integrated explanation required for that additional material stream.

This physically connects the two applications through material quantities and composition, receiving capacity, placement methods, peat handling, stability, drainage and haulage. The Commission must examine the grid construction methodology against the wind farm Spoil and Peat Management Plan and borrow-pit investigations.

My local evidence places T5, T7 and T8, the nearby large borrow pit, the cliff and scree and established nesting habitat on the connected mountain flank. The shared material-haul route makes road capacity, passing arrangements, loading, emergency access and environmental effects integral to the same issue. Each precise infrastructure position must be reconciled with the lodged layout.

The applicant had the opportunity to address this when preparing the wind farm application and again in its responses to Submission Reports in September 2026, and again when advancing the grid application. An assessment of each footprint separately does not establish the combined effects of excavation, vibration, material placement, drainage change and repeated heavy-vehicle movements.
I request refusal where the common-project material balance and combined effects have not been adequately established.

TOBIN’s distinction from the earlier refusal: evidence required to substantiate both reports

In its response dated 9 September 2026, Section 2.2.61, printed pages 141–143, TOBIN acknowledges that the earlier refusal of application 09/260 concerned intact upland blanket bog, surface-water pollution, slope instability and landscape effects. It states that these circumstances do not arise at Lissinagroagh because the development lies outside the designated area and does not overlap the earlier site.

A difference in application boundaries does not establish that the adjoining peat plateau, slopes and drainage cannot affect the present development. My objection from the beginning has concerned the absence of an identifiable investigation of the particular adjoining bog and peat-movement features documented in this submission.

The applicant must identify the investigations undertaken in those specific areas and at every relevant turbine, borrow pit and road location: their mapped coverage, dates, methods, peat depths and condition, groundwater and drainage observations, stability findings and relationship to the final design. It must explain the factual and scientific grounds for excluding any contributing upland area from those investigations.

General references to site investigations do not establish that these particular areas were examined. Section 2.2.90 and the Part 2 review themselves acknowledge streams originating on the steeper upper slopes and existing peat and scree movement. The engineering conclusions must account for that contributing ground.

These matters concern the EIAR’s assessment of ground and water effects and, where connected European-site receptors are affected, the evidence supporting the NIS. The absence of overlap with the earlier site does not resolve the suitability of the complete development.

Project splitting and the failure to substantiate a complete-project assessment

TOBIN’s response dated 9 September 2026, Section 2.2.55, printed pages 134–135, states that the wind farm and full grid connection are assessed as one integrated project. This must be read alongside its earlier single-project explanation in Section 2.2.4 and the principal study-area and material-management grounds in this submission.

My objection is not that two planning applications automatically constitute improper project splitting. It is that the applicant’s claimed assessment of one integrated project must be demonstrated by the evidence. Separate planning procedures do not remove the need to assess the physical interactions between the wind farm, grid route and associated infrastructure.

The assessment must reconcile grid excavation material with wind farm material in a combined balance covering quantities, characteristics, borrow-pit capacity, placement sequence, haul routes, loading, drainage and stability. Cross-referencing documents does not itself demonstrate that these combined effects have been calculated.

Section 2.2.45, response Item 7, printed pages 121–122, expressly confirms that no dedicated bird surveys were undertaken for the Grid Connection Route or Turbine Delivery Route accommodation areas. The response relies on desk information and incidental observations. A road corridor cannot be assumed to represent the full area affected by works on bridges, hedgerows, drainage and adjoining habitat.

Turbine-based bat surveys do not establish appropriate coverage of affected habitats and structures along the approximately 32 km grid route. References to bat observations or surveys undertaken during other work must identify their actual scope and locations. The aquatic assessment must similarly demonstrate adequate access, baseline coverage and investigation of relevant surface-water and groundwater pathways.

These gaps matter because they affect what the assessment could identify: habitat loss and fragmentation, disturbance, altered drainage, sediment transport and effects on connected protected waters. Future monitoring cannot supply a missing pre-development baseline.

Pre-application agreement on the statutory application route and cross-references in notices do not supply missing environmental evidence. I request that these complete-project deficiencies be examined by both case teams. They support refusal of the Grid Planning Application.

Renewable-energy policy and protection of the receiving environment

TOBIN relies on renewable-energy policy and the Coolglass judgment to support the development. However, paragraph 118(x) of that judgment rejects an approach favouring renewable-energy permission to the exclusion of other considerations. Climate obligations require substantive consideration, but they do not answer the particular deficiencies identified in the project’s environmental evidence.

Target 8 of the Kunming–Montreal Global Biodiversity Framework expressly calls for minimising the negative effects of climate action on biodiversity. This is an international policy commitment; it reinforces the need to consider biodiversity alongside climate benefits.

Sources: Coolglass Wind Farm Ltd v An Coimisiún Pleanála [2026] IESC 5, O’Donnell CJ, 4 February 2026, paragraph 118(x); Convention on Biological Diversity, Kunming–Montreal Global Biodiversity Framework, Target 8.

Lissinagroagh and Dough Mountain: protection of an important peatland landscape

Lissinagroagh forms part of the wider upland landscape surrounding Dough Mountain, where blanket bog, heath, forestry, exposed peat and water channels must be considered together. My objection concerns the effects of the complete development on that connected environment, including ground outside the construction footprint.

The State has already recognised this landscape’s conservation importance. The NPWS Site Synopsis for Dough/Thur Mountains NHA, site code 002384, dated 10 December 2003, describes extensive upland blanket bog and associated habitats. It identifies blanket bog as a globally scarce resource and explains that intact examples are particularly valuable because Ireland has already lost much of its original resource.

Peatlands deserve recognition alongside forests as important natural carbon stores. UNEP reports that peatlands occupy approximately 3–4% of the world’s land surface yet store around twice the carbon contained in all the world’s forest biomass.

Developing a wind farm at this location will interact with the surrounding peat, upland water contribution, existing erosion and downstream receiving waters. Excavation, concrete foundations, hardstands, roads, forestry clearance and material storage will alter the ground and drainage. These works will intercept and redirect water arriving from the uplands, changing where runoff accumulates and discharges.

In an environment already showing exposed peat, erosion, local collapse and standing water, these changes introduce risks of further erosion, peat instability and sediment release. Escaping sediment or contaminated runoff can enter connected channels and reach downstream waters towards Lough Melvin and Lough Gill. These interacting effects extend beyond the construction footprint and require assessment across the connected landscape.

Renewable-energy benefits do not establish that these effects have been adequately investigated or controlled. I maintain my request for refusal on the complete-project assessment deficiencies identified in this submission.

Sources: NPWS, Site Synopsis 002384, 10 December 2003; UNEP, Global Peatlands Assessment, 2022.

Source: Detailed material-management and grid engineering grounds; TOBIN borrow-pit response §2.1.1.37 and related construction responses; grid application construction methodology to be examined on both files.

4. Community engagement and affected households

TOBIN’s engagement account describes priority contact with residents within 2 km of the wind farm. It does not demonstrate equivalent engagement with affected households along the full grid route. The absence of that engagement is a substantive concern because household access, supplies, drainage, farm entrances and residential use inform the baseline.

The response also accepts that some homes were not visible on brochure or clinic maps and explains that assessment maps use numbered receptors. A property’s presence as a number does not establish that its occupier could identify the works affecting it or that household evidence informed the assessment.

I do not dispute that statutory consultation and some community engagement occurred around the Study Area of the Wind Farm site. I dispute the adequacy of grid-route household engagement and the

complete-project information available at the relevant times. A promise of future dialogue does not demonstrate that the EIAR and NIS already contain a complete household and receptor assessment.

Both masts and the permanent substation require consideration of their own locations and effects. General wind-farm property-price literature does not, by itself, establish the effects of grid construction, the substation or either mast on affected properties.

Source: TOBIN §§2.2.1-2.2.4, pp. 65-68; §§2.2.19-2.2.22; detailed consultation and residential grounds.

5. NHA, SACs and the connected blanket-bog landscape

The central environmental objection concerns the suitability of this location: Dough/Thur Mountain NHA, adjoining upland blanket bog and hydrological connections to downstream SACs. Their different designations must be respected while their physical and ecological connections are examined together.

TOBIN states that no works occur within the NHA and that it lies outside the drainage and dust Zones of Influence. That does not establish absence of effects from works on connected ground. The assessment must identify peat conditions, slopes, erosion, channels, springs, karst and the relationship of those features to the final works.

My photographic and local evidence identifies drainage channels, erosion, slippage and nesting habitat. The absence of a disclosed treatment of those features raises a concrete baseline concern. The Commission must examine the actual field records, survey maps and findings rather than infer completeness from chapter references.

TOBIN quantifies 38.83 ha of blanket bog within its wider survey area, 0.55 ha of direct blanket-bog loss, 0.89 ha of cutover-bog loss and 3.54 ha of potential indirect degradation. These figures do not establish the full connected peatland area outside that selected coverage. A small proportion of surveyed habitat is not evidence that effects remain localised.

Degraded bog remains peatland. Forestry and existing drainage pressures require assessment alongside the development, including its effects on restoration potential. Recovery can require active restoration; I do not assume that simply leaving every drained area alone guarantees recovery.

The 5.4 ha proposed management area includes blanket bog and wet heath. The larger 218.4 ha management opportunity must not be treated as though every hectare is a committed or equivalent replacement for lost peatland.

Source: TOBIN §§2.2.24-2.2.25, pp. 84-85; §§2.1.8.2 and 2.2.35; NPWS Dough/Thur Mountain NHA synopsis and detailed evidence.

6. Water pathways, karst and downstream protected waters

TOBIN expressly acknowledges hydrological connectivity to Lough Gill SAC and Lough Melvin SAC, including Northern Ireland, and states that these sites underwent Stage 2 appropriate assessment. My objection therefore challenges the adequacy of the pathway evidence and mitigation, rather than asserting that the SACs were entirely omitted.

My corrected local account is that flash-flood water from Saddle Hill joins the Ballagh River and flows towards Lough Melvin. This replaces the earlier attribution of that photographed channel to the Dooard

River. The photographs establish observed surface conditions; the Commission must reconcile the source-to-receptor route with authoritative mapping.

No in-stream works and setbacks from known features do not exclude runoff or groundwater pollution originating outside a stream. The assessment must distinguish surface drainage from karst and fractured-rock pathways and show how those connections were investigated.

TOBIN claims extensive karst fieldwork. I challenge its extent, methods and ability to establish underground flow directions, not the existence of every project survey. Visible-feature avoidance does not establish the absence of underground pathways beyond the survey boundary.

I draw attention to the neighbouring Faughery assessment’s record of short surface flows and turbine relocation, identified in my earlier evidence. The Commission must examine that official evidence and its relevance to runoff entering underground drainage at Lissinagroagh. The applicant must substantiate any distinction between the neighbouring conditions.

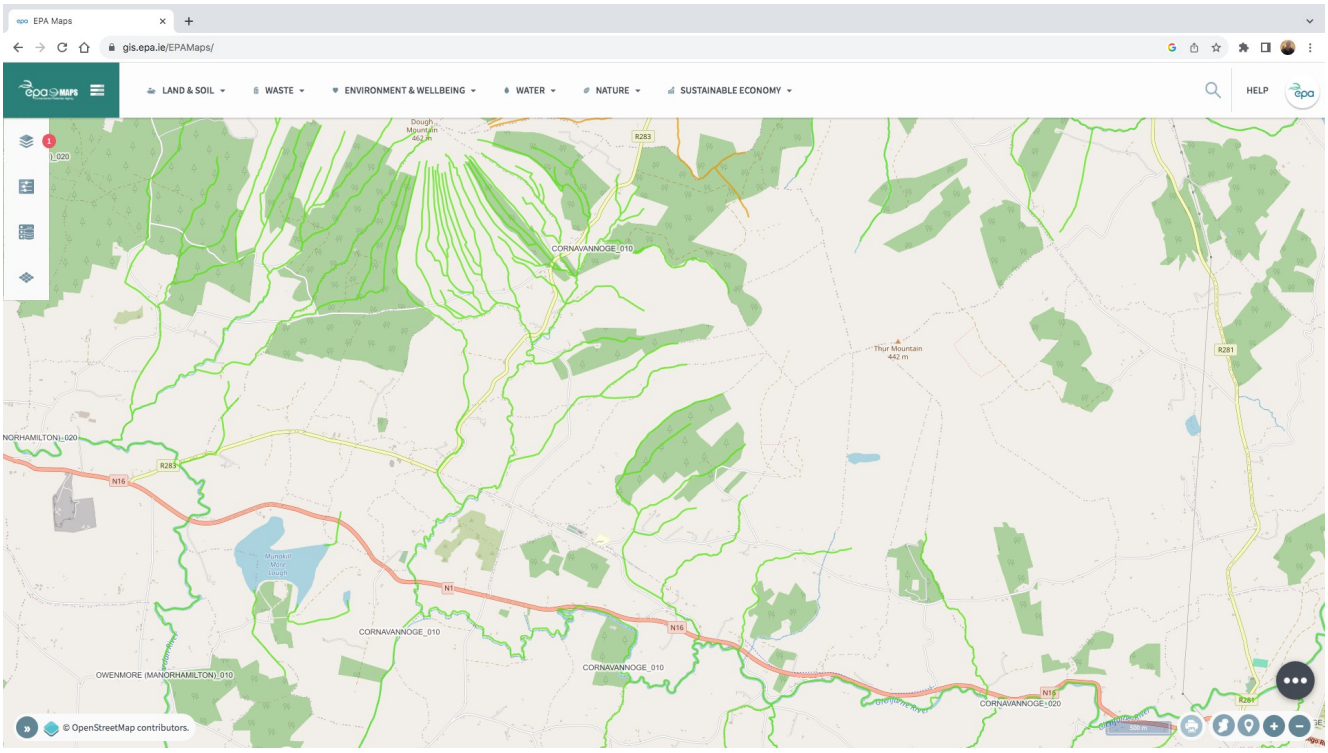
I reject reliance on embedded mitigation as sufficient proof of no significant aquatic effects at any geographic scale where route-specific access, aquatic coverage or pathway investigation remains incomplete. The detailed identifies six incomplete aquatic locations and the particular Site 23 access gap; those records require examination against the final route and works.

Source: TOBIN §2.2.23, pp. 82-84; §2.1.5, pp. 55-56; §2.2.30; NIS §§5.1.1.11-13, 5.2 and 7; detailed aquatic and karst grounds.

6. Water pathways: T14, Cornavannoge and the MacNean–Erne system

My local account identifies drainage below T14 entering Cornavannoge_010, east of Manorhamilton, and continuing through the Glenfarne/Cornavannoge river network towards Lough MacNean. The MacNean system connects onward through the Belcoo and Arney rivers to Upper Lough Erne in County Fermanagh.

The EPA's MacneanLoughsconnector_SC_010 assessment includes Cornavannoge_010 and _020. Leitrim County Council's Glenfarne Wood Options Report confirms the Cornavannoge–MacNean connection and onward drainage to Upper Lough Erne.



EPA Maps extract supplied by Joseph Sheerin. Turbine positions and construction outfalls require an overlay of the final design.

TOBIN's two response documents examined do not name Cornavannoge. Part 2, Section 2.2.1, places T6–T14 in the Owenmore and Bonet subcatchment. This must be reconciled with the mapped headwaters, T14 layout, roads and outfalls. The assessment must establish whether slippage, sediment or contaminated runoff can enter the Cornavannoge–MacNean–Erne system and assess downstream and transboundary effects.

Sources: EPA Maps, gis.epa.ie/EPAMaps/; EPA, MacneanLoughsconnector_SC_010 Subcatchment Assessment, WFD Cycle 2; Leitrim County Council, Options for New Tourism Infrastructure and Outdoor Recreation Facilities, Glenfarne Wood, October 2020.

7. Ground investigation and the excavation-method evidence

The Ground Investigations Ireland report, Rev. B dated 2 April 2026, p. 6, §§5.1-5.2, expressly limits interpretations between exploratory locations and records that limited information was provided. At BH02, weathered bedrock between 2.30 and 6.10 m below ground may provide borrow material, but further trial pits are recommended to determine its extent and depth. BH01 is described as too deep for an economically viable option.

The report identifies low-strength peat and soft deposits, temporary excavation stability and potential dewatering where granular deposits are penetrated. These recommendations must be reconciled with the final infrastructure, material placement and drainage assessment. Borehole labels must not be assigned to particular borrow pits without coordinate evidence.

The APEX geophysical report AGP24088 V02, dated 13 December 2024, identifies breaking or blasting requirements for rock and recommends further excavation-feasibility investigation. TOBIN's stated intention not to blast requires evidence that its alternative method is feasible; the report does not establish that blasting is inevitable.

The GII statement about licensed disposal of any waste removed off site is conditional. I do not treat it as a direct contradiction of an on-site retention proposal. My objection concerns whether capacity, material suitability and the complete grid material stream were actually assessed.

Source: GII Ground Investigation Report Rev. B, 02.04.26, p. 6; APEX AGP24088 V02, 13.12.24, conclusions; TOBIN §§2.1.1.35-2.1.1.37.

8. Roads, passing bays and public safety

The assessment must distinguish national-junction capacity from the physical capacity and safety of narrow final-approach roads. Junction modelling does not establish pavement, bridge or culvert capacity, safe HGV passing or protection of residential access.

The traffic response describes approximately 58 daily ordinary HGV movements and approximately 460 movements on turbine foundation-pour days. The assumptions must be reconciled with grid excavation haulage, internal material transfers using public roads and actual delivery coordination. Material already included in traffic totals must not be counted twice.

The Traffic Management Plan identifies eight public-road passing bays on L6184 and references drawings 10955-2080 to 2082. Their footprints and environmental effects require comparison with habitat and drainage mapping. Width thresholds for existing roads must not be presented as the designed width of an individual bay.

Pre- and post-construction condition surveys and later road-authority agreements do not themselves establish present structural suitability. The ground, peat, drainage,

visibility and environmental consequences of necessary strengthening or widening require adequate pre-consent assessment.

TOBIN's public-safety response concentrates on construction legislation and future plans. The complete-project assessment must demonstrate location-specific arrangements for homes, farms, pedestrians, cyclists, queues, diversions and emergency access. I request refusal where substantive effects remain unidentified rather than assuming a later contractor plan will resolve them.

Source: TOBIN §§2.1.1.27-32, pp. 23-31; §§2.1.9 and 2.2.22; EIAR Chapter 16; Traffic Management Plan F04, 28 April 2026.

9. Survey boundaries, habitat fragmentation and compensation

TOBIN acknowledges that identified adjoining lands at Shasmore and Lisdarush were not ecologically surveyed because it considers them outside the relevant Zones of Influence. The evidence supporting that exclusion must be mapped and examined against the connected habitats and water pathways.

Survey age and coverage are different issues. Considering existing data beside a final layout does not establish that every newly affected location was investigated. The response discloses absence of targeted Annex I surveys for certain wet-heath examples and uses precautionary classifications. Such classifications do not establish physical drainage connections.

The marsh fritillary plan correction from 22.58 ha to 2.58 ha reduces the stated wet-grassland management provision by 20 ha. The Commission must establish that suitability, capacity and compensation conclusions used the correct area.

I reject existing fragmentation by forestry and dead-end tracks as a sufficient justification for insignificant additional effects. New and widened roads, passing bays, excavations and drainage alter habitat continuity and wildlife movement. Retained habitat can lose function without direct removal.

TOBIN identifies a likely significant fragmentation effect involving only 0.06 ha of riparian woodland at T11. This itself demonstrates why footprint size alone cannot determine significance.

Source: TOBIN §§2.2.29, 2.2.33-2.2.36, pp. 86-91; EIAR Chapter 5; OBMP Appendix 6-13, §2.3.

10. Grid birds, bats and incidental observations

TOBIN expressly confirms that no dedicated bird surveys were undertaken for the grid route or turbine-delivery accommodation areas. It relies on a desk buffer and incidental recording during other surveys. The adequacy of those methods must be assessed against affected roadside habitats, crossings and adjoining species use.

Incidental bird sightings during aquatic surveys are useful supplementary evidence but do not establish full breeding, seasonal or nocturnal coverage. The Commission must

identify the observers' relevant competence, methods, dates, routes and access limitations.

The bat response primarily describes turbine-location detectors and wind-farm building and transect surveys. Section 2.2.45(7), however, refers to bat surveys along the routes. I therefore do not rely on an absolute assertion that no bat work occurred. I request identification of its actual type, spatial coverage and adequacy for roosts and commuting habitat affected by grid works.

My report of approximately 100 bats in a shed near T14 requires specialist investigation. Feathering and cut-in speeds address turbine mortality; they do not by themselves address loss of roosts, habitat severance or lighting effects.

Source: TOBIN §2.2.45(7), pp. 120-121; §§2.2.38.1-2; EIAR Chapters 5-6; detailed bat evidence.

11. Hen harrier: significant effects and enforceable protection

TOBIN accepts significant, long-term negative disturbance effects on breeding and foraging hen harrier at national scale and a potentially significant regional collision effect. It accepts that disturbance may result in effective loss of breeding hen harrier from the site.

The response relies on compensation and says curtailment at specific turbines is available if monitoring supports it. Availability is not a defined trigger, timescale or enforceable response. The Commission must establish what protection applies if the habitat package fails or collision and displacement exceed predictions.

My evidence also raises the applicant·s financial and electricity-output objection to operational restrictions. The Commission must compare the precise earlier wording with §2.2.42 before accepting the adaptive-management assurance. I do not treat permanent cessation and temporary targeted curtailment as interchangeable.

TOBIN claims compensation land is secured by legal agreements, while describing detailed binding site-specific arrangements and farm plans as matters following permission. I request examination of the executed agreements, parties, duration, transfer provisions, access, monitoring and enforcement. Statutory designation is not the only possible mechanism, but a future intention is not equivalent to demonstrated security.

The 18-month establishment lead-in and construction disturbance arrangements must be tested against habitat readiness and seasonal nesting evidence. Larger management acreage does not establish that the required nesting and feeding functions will be available when displacement occurs.

Source: TOBIN §§2.2.39-2.2.42, pp. 100-112; EIAR Chapter 6, Tables 6-20 and 6-24; OBMP §§2.4, 3.2.2 and 3.3.

12. Terrain, flight directions and collision modelling

My hen harrier observation from the sand martin nesting area was of a bird above the tree line but below my position, while higher Dough ground remained above me. The proposed turbines surround this used landscape. This is local evidence requiring comparison with mapped flight lines, not proof by itself of a rotor intersection.

Flight heights must be related to actual terrain and rotor elevations. A bird flying low above the 465 m upland can be at the rotor elevation of a turbine founded lower down a slope. Above-sea-level altitude and height above local ground must not be confused.

TOBIN acknowledges that all flights in the unbounded above-175 m category were treated as above the 185 m blade tip. The category includes the 175-185 m interval. Difficulty estimating that difference requires sensitivity examination rather than an automatic assumption of no exposure.

I request analysis of hunting routes, flight directions and the turbine layout, including combined habitat displacement and collision effects on the same population over time. A bird avoiding a rotor on one flight does not establish that the two pressures cannot combine at population level.

Martin’s 2011 sensory-ecology review supports considering ground-directed attention and visual-field limitations during flight. It does not justify assuming every hunting bird will fail to see a rotor. Its relevance must be applied to the species and site evidence.

Source: TOBIN §2.2.44(1)-(5), pp. 113-117; Appendix 6-14, §3.1; Martin (2011), Ibis 153, 239-254, DOI 10.1111/j.1474-919X.2011.01117.x.

13. Storm Éowyn and the changed baseline

TOBIN justifies older survey data by stating that site conditions and habitats have not materially changed. My photographs record extensive storm windthrow on both sides of the road ascending Dough, together with exposed slope and road conditions.

The assessment must demonstrate whether canopy, shelter, ground drainage, habitat and flight use changed and whether the 2025-2026 surveys covered the damaged area. Appending a winter survey does not establish that the ground and ecological consequences of that change were assessed.

Leitrim County Council repaired the road and Coillte cut some affected trees, according to my observations. Those actions demonstrate attendance, not approval of the development’s safety. Their inspection and repair records are relevant baseline evidence for the Commission to obtain.

The cliff is naturally eroding. My objection concerns additional effects of development beside it. If protective netting or stabilisation is required elsewhere in the design, its location, method and ecological consequences require assessment. Page 125 itself proposes an artificial nesting wall, not cliff netting.

Source: TOBIN §2.2.45(1), pp. 117-118; Joseph Sheerin photographs; detailed post-storm and drone evidence.

14. Sand martins: retain the natural colony and assess the whole setting

I did not state that the colony is 25 m from T8. TOBIN attributes that measurement to the Save Dough Mountain submission. I rely on my photographs, local observations and the actual cliff-road setting; the competing coordinates and measurements require reconciliation.

TOBIN's 338 m distance from T8 does not establish distance to road works, drainage or haulage. Its reply does not adequately answer the established colony's decades of use, elevated position, feeding and flight routes or the interacting slope and construction concerns.

I reject an artificial nesting wall as a substitute for the established natural bank and its supporting environment. My concern also includes other nesting locations along the same cliff face. Protecting one mapped point does not establish protection of the full cliff habitat or colony. The voluntary offer does not establish that birds will occupy a wall or stop nesting elsewhere along the same cliff face. TOBIN's solution is to turn a natural environment into an artificial nesting site.
My evidence identifies the sole summit access route, erosion face, nearby borrow pit and turbines. The EIAR must demonstrate combined effects of excavation, vibration, loading, drainage and vehicle movements. Future active-nest checks cannot resolve an inadequately investigated slope or road-safety question.

I request refusal where retention of the existing colony and protection of its surrounding environment have not been demonstrated. The natural environment cannot be assumed to adapt successfully to development-imposed changes.

Source: TOBIN §2.2.47(3), printed pp. 124-126 and Figures 2-4 to 2-5; photographic plates in Part B.

15. Noise, tourism, heritage and emergency access

The HSE/NEHS concerns about changes to the noise environment and cumulative baseline require a direct answer. Predicted turbine levels do not necessarily supply the requested change-from-baseline table. Substation and grid construction receptors require their own assessment.

Tourism and community effects must be assessed through local amenities, livelihood and landscape evidence, not only distance to popular attractions or generic surveys. Community-benefit payments do not establish absence of adverse effects on quiet, habitat or daily life.

The Heritage Council's concerns about the visual relationship of Saddle Hill monuments and T3 require examination on their merits. Absence of another body's objection is not proof that the concern is resolved.

The aviation reply leaves further airport and AirNav engagement to after permission. My specific concern is emergency helicopter operations around the upland and across

the border in poor visibility. The assessment must show relevant operator consultation and obstacle-risk evidence; I do not assert that this is a proven mandatory Northern Ireland consultation breach.

Source: TOBIN noise response pp. 35-38; §§2.1.6-2.1.8, pp. 57-62; §§2.2.17-2.2.19; detailed amenity grounds.

16. Correct legal tests and relevant precedents

I do not apply the Article 6(3) reasonable-scientific-doubt test indiscriminately to all biodiversity. EIA must identify, describe and assess significant direct and indirect effects, including interactions. Appropriate assessment must support the no-adverse-integrity conclusion for European sites under its separate test.

Listing legislation and guidance does not answer specific investigation gaps. Where the gap concerns SAC pathways, it is relevant to appropriate assessment; where it concerns wider habitat and species effects, it remains relevant to EIA.

Commission v Ireland, C-215/06, 3 July 2008 (Derrybrien), paragraphs 96-105 and 112, addresses peat extraction and road construction as integral works requiring assessment where likely significant effects arise. Ecologistas en Acción-CODA, C-142/07, 25 July 2008, paragraphs 36-46, supports examination of road improvements and the overall project.

Holohan, C-461/17, 7 November 2018, paragraphs 39-40, requires consideration of habitats and species outside a European-site boundary where effects can affect its conservation objectives. These cases support an effects-based investigation area; they do not prescribe one fixed survey width or automatic refusal of every road work.

Source: TOBIN §§2.2.31-2.2.34 and 2.2.48; Directive 2011/92/EU as amended, Article 3; cited CJEU judgments available through EUR-Lex.

17. Cross-border acknowledgement and determination sought

TOBIN’s notification dated 12 May 2026 acknowledges likely significant environmental effects in Northern Ireland and the single-project relationship. Its later response predicts no significant residual cross-border effects. Those statements concern different stages and are not inherently contradictory; the question is whether the assessment substantiates the later conclusion.

Fermanagh and Omagh District Council’s response identifies very limited residential-amenity information and concerns about water, habitats, landscape capacity, cumulative effects and tourism. The original correspondence is reproduced in Part D.

I request refusal on the combined deficiencies set out in this volume. The Commission should obtain the underlying investigations, route and material records, compensation agreements and prescribed-body responses where necessary. I am not required to commission missing applicant investigations to identify a substantiated concern.

I request that this submission and later grid material be considered on both application files, that both case teams be notified of the shared material-management and environmental pathways, and that any significant further information receive the appropriate opportunity for public examination.

The study area must be widened to include the connected upland bog, cliff, drainage channels, karst and receiving environment affected by the final development. The same requirement applies along the grid route wherever the works affect connected ground and waters outside the narrow construction corridor.

Grid-material journeys and TOBIN’s road-capacity claim

TOBIN states in Section 2.2.75 that “the road network can accommodate the temporary construction traffic, subject to the proposed access arrangements, passing bays and mitigation measures”. However, its response does not identify where traffic carrying excavated grid material to the wind farm borrow pits is included in the quoted forecasts. This directly relates to the earlier omission concerning combined material quantities, borrow-pit capacity and transport routes.

Section 2.2.83, printed pages 171–172, describes material movements and public-road traffic in detail, but does not expressly identify traffic transporting excavated grid material to the receiving pits. Its general assertion that material movements are included does not demonstrate where these grid-related journeys have been quantified and incorporated into the combined traffic assessment.

The separate application boundaries do not remove the need to account for this material consistently from excavation, through transport, to final placement. The assessment must identify quantities, loaded journeys, return trips, routes and overlapping construction activities, together with combined borrow-pit capacity, loading, drainage, peat stability and downstream water effects.

Neither application can rely on the other without identifying where these linked effects have actually been assessed. The responses examined do not provide that reconciliation and therefore do not substantiate TOBIN’s claim of a complete-project assessment.

TOBIN’s Section 2.2.78 states that pavement strengthening, road-edge support and remedial works will be identified through pre-construction inspection and detailed construction planning. A road-condition survey establishes a baseline for damage and reinstatement. It does not, by itself, demonstrate the stability of the adjoining cliff or slopes under the proposed loading, or assess the environmental effects of additional road-support and drainage works.

Promises to inspect, maintain and repair roads do not substitute for assessing these location-specific risks and the combined grid-material traffic before permission is determined.

Borrow pits, adjoining blanket bog and combined grid-material storage

In Section 2.2.90, printed page 182, TOBIN quotes the review stating that the three borrow pits have sufficient capacity for peat and surplus mineral soil excavated “from the site”. This passage does not expressly identify surplus grid material or reconcile it with the combined storage quantities, loading and drainage requirements.

Section 2.2.83, printed pages 171–172, confirms that the L6184 serves turbines T1–T8 and Borrow Pit 2. These omissions must be considered alongside Section 2.2.90, printed pages 180–182, which acknowledges streams originating on the steeper upper slopes and relies on drainage and below-ground borrow-pit storage to manage instability.

The large borrow pit beneath Dough Mountain must therefore be assessed in relation to the adjoining blanket bog, slopes and upland water contribution, together with the combined wind farm and grid material it will receive. The responses examined do not identify how the particular surrounding bog and peat-movement features documented in my photographs were incorporated into that assessment.

This concern remains even if individual turbines are omitted. It directly tests TOBIN’s claim in Section 2.2.55, printed pages 134–135, that the EIAR assesses the wind farm and full grid connection as one integrated project.

Blasting references require reconciliation

TOBIN states in Section 2.2.89 that blasting is not proposed and has not been assessed in EIAR Chapter 11. This must be reconciled with the references to blasting identified elsewhere in the project documentation and discussed in the earlier borrow-pit grounds. The applicant must establish whether blasting is excluded from the construction methods or remains an available contingency.

If it remains available, its relevant effects, including dust, vibration and effects on the adjoining cliff and nesting colony, require assessment. I do not treat a recommendation to investigate possible blasting as proof that blasting is definitively proposed; the construction-method position must be made consistent across the documents.

Degraded peat remains a carbon store: relocation does not establish negligible emissions

In Section 2.2.68, printed pages 149–150, TOBIN relies on the degraded condition of the peatland to conclude that excavating and relocating approximately 101,911 m^3 of peaty soils and peat would have a negligible climate impact.

This confuses the peatland’s present emissions with the carbon still stored within it. A drained bog can release carbon while retaining a substantial carbon stock. Existing degradation does not demonstrate that further excavation, handling, drainage and storage will produce no additional emissions.

Keeping excavated peat within the site boundary does not establish that its carbon will remain stored. The assessment must explain the conditions under which peat will be placed in the borrow pits, including water levels, exposure to oxygen, vegetation establishment and long-term management. The statement that there is “no loss of peat or subsoil” describes retention of material, rather than demonstrating retention of its carbon.

The calculation also contains an apparent unit error. The quoted emission factor is 1.2 tonnes of CO_2-C per hectare per year. Applied to 23.3 hectares, $23.3 \times 1.2 \times 44/12$ gives approximately 102.5 tonnes of CO_2 per year, rather than approximately 27 tonnes of CO_2e. The applicant must reconcile this discrepancy and demonstrate that the selected emission factor represents the actual habitats and conditions assessed.

TOBIN describes an exclusion threshold based on total lifetime greenhouse-gas emissions, but compares peat excavation emissions against operational emission savings. These are different quantities. Its response does not demonstrate that the exclusion criterion has been correctly applied.

The stated approximately ten tonnes from excavation activity does not establish that emissions from subsequent peat decomposition, altered drainage and storage have been assessed. EPA research supports avoiding further drainage and reducing emissions from already drained peatlands; existing degradation does not establish that further disturbance is environmentally negligible.

Sources: TOBIN Section 2.2.68; EPA Research 236, Network Monitoring Rewetted and Restored Peatlands/Organic Soils for Climate and Biodiversity Benefits, 2018; EPA Research 401, Peatland Properties Influencing Greenhouse Gas Emissions and Removal, 2022.

Surrounding peat, drainage and consequences of peat movement

The proposed development involves excavation and drainage associated with roads, turbine foundations, hardstands and borrow pits. These works will alter how water moves through the remaining peatland, intercepting and redirecting runoff into roadside drains and receiving watercourses.

Where these changes lower peat water levels, they expose peat to oxygen and promote decomposition, releasing stored carbon. Relocating excavated peat within the site does not prevent that process. The assessment must account for additional carbon release from both excavated peat and remaining peat affected by drainage.

TOBIN also acknowledges peatland and upland drainage surrounding the proposed works. The response does not identify how that surrounding peat has been included in its carbon calculation, or quantify the consequences of altered water levels, erosion and peat slippage. Its reliance on relocating excavated material within the site does not answer what would happen if peat moved beyond the designated storage areas or entered connected watercourses.

The peat-stability assessment must be reconciled with the carbon and aquatic assessments. A conclusion of low instability risk does not quantify the consequences of a failure, including carbon loss, sediment release and effects on downstream receiving waters. These interacting effects cannot be dismissed by counting excavation machinery emissions alone.

Peat-stability conclusions must address adjoining ground and drainage changes

In Section 2.2.90, TOBIN states that the development will not cause long-term drying of peat. However, the same section describes drainage designed to intercept and divert surface runoff, collect groundwater and prevent water accumulating beneath infrastructure. The applicant must demonstrate how these changes will affect water levels in adjoining peat, rather than relying on the absence of “deep drainage” as proof that drying will not occur.

My Saddle Hill photographs document exposed and locally collapsed peat, standing water and runoff entering channels. These conditions must be reconciled with the description of peat as dry, well drained and of low instability risk.

My photographs identify adjoining blanket bog, steep slopes and existing peat movement relevant to the proposed turbine locations. The applicant’s responses do not identify a survey of the particular bog areas and slippage features I have documented, or explain how their condition, drainage and potential movement were incorporated into the assessment.

Investigations beneath turbine foundations do not substitute for examining the peat and slopes above and beside them. The engineering conclusion of low risk must be supported by evidence covering these contributing areas. Without that evidence, it does not resolve the specific concerns raised in this submission.

The large bank of blanket bog overlooking the proposed T2 and borrow-pit area is documented in my Saddle Hill photographs. Even if T3 were omitted, T2 and the borrow pit would remain beneath this adjoining peatland. The removal of one turbine cannot substitute for assessing the surrounding bog and its interaction with the infrastructure that remains.

TOBIN relies on limited historical slide runout and low-gradient ground when addressing nearby homes and the R282. That explanation must distinguish the runout of the peat mass from the onward transport of sediment by connected watercourses. A slide stopping on a slope does not establish that its aquatic effects stop there.

Investigations must establish environmental pathways beyond the infrastructure footprint

In Section 2.2.91, TOBIN expressly acknowledges that peat slippage entering streams and rivers can significantly affect downstream water quality and aquatic ecology. Its conclusion of no significant threat must therefore address both the likelihood of failure and its consequences for connected receiving waters.

The average peat depth across probe locations does not establish conditions at each turbine, road or borrow pit. The response records peat depths reaching 4.5 m in the north and identifies T3, T4, T5, T7 and T8 within areas ranging from Low to Moderately High landslide susceptibility.

Section 2.2.92 records 71 possible karst features, preliminary tracing undertaken on 11–13 November 2024, and a rotary corehole at T7. I therefore do not contend that no karst investigation occurred. My objection concerns what these investigations establish, their geographical coverage and unresolved pathways outside the construction footprint.

The presence of surface streams does not, by itself, exclude underground connections. Likewise, sound rock in one corehole at T7 does not establish the absence of cavities or groundwater pathways elsewhere. The preliminary tracing requires identifiable injection and detector locations, results, monitoring coverage and limitations before it can substantiate conclusions about downstream connections.

There is also an inconsistency requiring reconciliation concerning the Seven Rooms cave. Section 2.2.52 acknowledges submitted coordinates, places T3 approximately 214 m from the cave and states that its extent is unknown. Section 2.2.92 subsequently describes the location as not presented or verified. The applicant must explain how the reported entrance and unknown underground extent were investigated and considered in the design.

Engineering measures capable of supporting foundations do not, by themselves, demonstrate protection of groundwater or downstream habitats. Proposed grouting, infilling, drainage and foundation changes require assessment of their effects on water movement and connected receptors. Comparisons with other developments cannot establish those effects at this location.

Acknowledged connections to Lough Melvin and Lough Gill

In Section 2.2.102, printed page 192, TOBIN confirms that part of the wind farm drains towards Lough Melvin. It also acknowledges connections to Lough Gill through the Owenmore (Manorhamilton)_020 and Brackary_010 rivers and tributaries, including an indirect groundwater connection through discharge to the Owenmore River.

The issue is therefore the adequacy of the assessment and protection of these acknowledged pathways. Existing forestry, farming, peat cutting and drainage do not demonstrate that additional excavation, drainage changes and combined material storage will be harmless.

TOBIN also claims that runoff controls will provide long-term water-quality benefits. That claim must be supported by the actual contributing catchments, existing flood conditions, proposed discharges and performance of the controls during prolonged rainfall. The photographs and receiving-water conditions documented in this submission require reconciliation with that conclusion.

The same section identifies proposed peatland enhancement extending into Torr/Dough Mountain NHA. The applicant must clearly distinguish these management works from construction works and identify their location, methods and effects within the complete-project assessment.

Landscape policy does not establish ground suitability

In Section 2.2.57, printed pages 137–139, TOBIN relies on the Renewable Energy Strategy's conditional identification of some limited moorland areas near Dough Mountain and Saddle Hill for consideration, subject to detailed design and landscape, visual and cumulative constraints. Identifying land for consideration does not establish that its peat, slopes, hydrology or habitats have been investigated and found suitable for the proposed works.

The evidence presented in public submissions, considered alongside the deficiencies in TOBIN's supporting investigations, demonstrates why I consider this location unsuitable for the proposed development.

Despite the applicant's stated multi-year study programme, the responses examined do not adequately resolve the documented peat collapse, erosion, pooling, drainage connections and downstream receiving conditions. Nor do they reconcile the grid-material transfers and survey gaps identified in this submission.

The Development Plan's conditional identification of land for consideration cannot outweigh these unresolved site-specific findings. A lengthy study programme is not proof of an adequate assessment. I seek refusal because the submitted evidence does not demonstrate that the complete development can proceed without unacceptable environmental effects.

Existing land use does not establish capacity for further development

In Section 2.2.63, TOBIN relies on commercial forestry and the existing three-turbine Faughary Wind Farm when explaining its "Medium" landscape sensitivity classification. These existing modifications do not demonstrate that the landscape can accommodate fourteen additional turbines reaching 185 metres, together with a substation, masts, roads, hardstands and borrow pits.

The relevant question is the combined change produced by the proposed development. Existing forestry and turbines cannot simply be treated as a justification for further intensification. Their effects form part of the receiving conditions against which the additional development must be assessed.

TOBIN itself acknowledges "Substantial-moderate" landscape and residual visual effects. Its reliance on a "Medium" sensitivity classification does not explain why this substantial increase in the scale, number and spread of infrastructure would be acceptable in the Dough Mountain and Saddle Hill landscape. Nor does that classification resolve the separate evidence concerning peat instability, drainage, erosion, habitat loss and downstream receiving waters.

Layout revisions do not demonstrate landscape capacity

In Section 2.2.64, TOBIN acknowledges that the proposed development lies within the Dough Mountain Area of High Visual Amenity and that the Development Plan identifies moorland plateaux as particularly sensitive to change because of their mountain skylines, scenic quality, wilderness-like character and visual openness.

TOBIN relies on the reduction from an earlier twenty-turbine layout to fourteen turbines as evidence of its design response. However, its response does not identify why the successive layouts changed from twenty to eighteen, fifteen and fourteen turbines, which locations were removed at each stage, or the constraints that prompted those removals.

Without that explanation, the reduction cannot be attributed entirely to landscape protection. The response does not demonstrate whether turbines were removed because of visual effects, peat conditions, slope stability, ecological constraints, access requirements or other considerations.

TOBIN's response also does not explain whether locations removed from successive turbine layouts remain proposed for roads, borrow pits, drainage, material storage or other infrastructure. Where a turbine location was rejected because of peat, slope stability, hydrology or ecological constraints, removing the turbine does not resolve those constraints for another use.

The applicant must identify why each location was removed, what use is now proposed there, and the evidence establishing its suitability for that use. Without this explanation, the reduction in turbine numbers cannot demonstrate that the environmental constraints have been resolved across the complete development.

Acknowledged prominence of T3, T13 and T14

In Section 2.2.65, TOBIN accepts that the proposed turbines will have a dominant visual presence at some nearby receptors. It specifically identifies T13 and T14 as occupying elevated positions where the uphill viewing angle accentuates their apparent scale, producing a "Substantial-moderate / Negative / Long-term" effect at VP21. It also identifies T3 as the most prominent element of the proposed array against the skyline at VP08.

These acknowledgements must be considered alongside Leitrim County Council's recommendation to omit T3, T13 and T14 on landscape grounds, in the Chief Executive's Report, printed page 51. Describing their effects as localised does not resolve the impact on the people and landscape within those locations.

The fact that similarly tall turbines have been permitted elsewhere does not establish suitability at Dough Mountain and Saddle Hill. Likewise, the tourist preference survey cited by TOBIN concerns a comparison between groups of larger and smaller turbines producing equivalent electricity. It does not demonstrate acceptance of this particular development or assess its effects on local heritage, tourism and landscape.

Incomplete depiction of the development and omission of the Dough Mountain summit view

My earlier submission identified that the photomontages do not depict the complete development, including associated roads, hardstands, borrow pits, the substation, masts and forestry clearance. It also identified the absence of a representative view from the top of Dough Mountain.

The summit provides a view across and down onto the development, revealing its spread across the surrounding slopes. Lower-level viewpoints cannot substitute for that perspective.

TOBIN’s explanation of its photographic equipment and modelling in Section 2.2.66 does not answer these omissions. The response must identify where the missing infrastructure is depicted and where the summit view has been assessed. Without this, the photomontages do not demonstrate the full landscape and visual effects of the proposed development.

Unresolved Net1 interference and omission of the 23 m mast from the complete-project assessment

TOBIN maintains that the EIAR assesses the wind farm and grid connection as one integrated project. However, its telecommunications conclusions must be reconciled with the permanent 23 m mast proposed in the Grid Planning Application.

In Section 2.2.86 of its Part 1 response, dated 9 September 2026, TOBIN states that no direct impacts on Adelphi Net1 are anticipated and that no operational interruptions will occur. Yet the same response identifies raising the existing antenna or providing a relay mast as possible mitigation, with the solution deferred until further consultation before construction.

The need for a mast to address turbine-related interference cannot be reconciled merely by asserting that no direct impact is anticipated. The assessment must distinguish the interference caused by the development from the outcome expected after mitigation. Net1 has not accepted a mitigation solution, as set out in my correspondence and evidence. Agreement that the developer would bear mitigation costs does not establish technical acceptance or continuity of service.

The inclusion of the 23 m mast in the grid application also requires an identifiable assessment of that structure within the shared EIAR. This is a separate structure from the 100 m meteorological mast. Its foundations, access, operation and relevant environmental effects cannot be treated as assessed simply because another mast was considered.

The omission extends to the photomontages, which do not depict the 23 m mast’s contribution to the combined appearance of the turbines, substation and associated infrastructure. This reinforces the earlier objection that the visual material does not represent the complete development.

The applicant must reconcile the telecommunications report, the proposed mast and the visual assessment, identifying when the interference was established, when the mast design was developed and where its effects were assessed. Until that reconciliation is provided, the assurance of uninterrupted service and the claimed complete-project assessment remain unsubstantiated. These deficiencies support my request for refusal of the Grid Planning Application.

Updated bird survey requires reconciliation with the assessment

The MKO Winter Bird Survey Report 2025–2026, finalised 21 May 2026 and included as Appendix A to TOBIN's Part 1 response, provides additional evidence of bird use of Dough Mountain and the surrounding landscape. Its incidental records include 75 golden plover within the study area on 11 March 2026, and two white-tailed eagles described by the surveyor as adult birds approximately 5 km west on 17 October 2025.

The golden plover record appears in report Table 4-6, printed page 11, and Appendix 2, Table 3, printed page 12. The adult eagle record appears in Appendix 2, Table 3, printed page 11. These findings require explicit consideration alongside TOBIN's summaries and the assumptions supporting its assessment.

The adult eagle record does not establish nesting or adult activity at the turbines, but its relevance to the wider population and the juvenile-based collision-significance assumptions requires explanation. Table 4-2, report page 7, separately records 510 bird-seconds at potential collision height for a white-tailed eagle observation within the study area.

The survey retains the division between flights at 25–175 m and flights above 175 m, in Section 3.1, report page 3. It therefore does not resolve the earlier concern about the upper portion of the proposed 185 m turbine envelope.

The report confirms a regularly used hen harrier winter roost, up to two birds during four of the six surveyed months. Separation of approximately 1.2 km from the nearest turbine addresses the roost location, but does not by itself describe all commuting and hunting movements.

Walkover and grouse methods state that transects were undertaken "where access allowed", in Sections 3.2–3.4, report pages 3–4. Relevant limitations must be identified when relying on comprehensive coverage.

The report includes a March 2026 red grouse survey under NPWS licence and names its authors, reviewer and field surveyors. These findings update the earlier survey-recency discussion; I do not contend that no grouse surveys occurred after 2022 or that the new report omits all surveyor information.

Updated wind farm observations do not supply the missing dedicated grid-route surveys or, by themselves, demonstrate that the new records have been incorporated into the collision, displacement and cumulative assessments.

Determination requested on the complete-project evidence

The foregoing findings are to be read with the retained detailed grounds, maps, photographs and correspondence. My request is based on the substantive deficiencies in the assessment of the connected ground, habitats, material movements and receiving waters.

I request refusal of the Grid Planning Application and consideration of these linked grounds by the wind farm case team. The separate application procedures do not remove the need for adequate and consistent evidence concerning the complete project.

I request that the Commission examine the underlying records wherever necessary to determine whether the applicant's conclusions are substantiated. A conclusion of no significant residual effect must be supported by the actual investigations and combined design, rather than by general mitigation assurances or the development's renewable-energy benefits.

Examination of TOBIN's two response documents: grid excavation material and the complete project

This examination begins with the omission of grid excavation material from the stated borrow-pit assessment. It links the wind farm and grid planning applications directly, followed by the related concerns about storage capacity, haul traffic, drainage, peat stability, storm overflow and downstream receiving conditions.

The first response is TOBIN's Response to Submissions Report dated 9 September 2026. The second is TOBIN's Response to Submissions Report, Part 2, dated 25 September 2026. References below are to the printed page numbers in Part 2 unless otherwise stated.

The detailed passage examined below does not expressly identify grid-route material. The concern must be tested against the material-management proposals and calculations for the complete project, supported by the shared EIAR and NIS.

1. Failure to account for grid excavation material in the borrow-pit assessment

TOBIN's Part 2 response, dated 25 September 2026, printed page 9, states that excess peat will be deposited below existing ground level in borrow pits. It does not expressly identify material excavated along the Grid Connection Route or demonstrate how that material is included in the pits' capacity, drainage and stability calculations.

This omission links the two planning applications directly. Where the grid application proposes bringing excavated material to the wind farm's borrow pits, the assessment must account for the combined quantities, material characteristics, transport movements, placement and effects during prolonged rainfall.

Without that reconciliation, the quoted response does not demonstrate that the borrow pits can safely accommodate the complete project's excavated material. This supports my request for refusal of the Grid Planning Application.

TOBIN's Part 2 response, dated 25 September 2026, printed pages 11–12, quotes the AGL review stating that the three borrow pits have sufficient capacity for estimated peat and surplus mineral soil excavated from the site. The quoted passage does not identify grid-route material or demonstrate its inclusion in the storage calculations and phased construction programme.

Where the grid application proposes transferring excavated material to these pits, the assessment must reconcile the combined quantities, material characteristics, delivery programme, available storage capacity and drainage requirements. The stated capacity conclusion cannot be treated as covering grid material without that evidence.

The approximately 32 km grid route will generate excavated material, but its length alone does not establish the volume requiring storage. The assessment must distinguish material reused along the route from material transported to the wind farm's borrow pits.

TOBIN's Part 2 response, dated 25 September 2026, printed pages 11–12, states that the pits have sufficient capacity for excavation material "from the site", without expressly identifying the grid contribution. Without quantified grid material and a combined storage calculation, the response does not demonstrate sufficient capacity for the complete project. This omission also affects the assessment of haul traffic, placement, drainage and stability.

2. Storm overflow and combined peat-and-water release across the wind farm

The entire wind farm development, including turbine foundations, hardstands, access roads, roadside drains, borrow pits, compounds and the substation, will alter how runoff is collected and directed across the landscape.

During storms on Dough Mountain, rainfall can persist from an intense hour to several days, as I observed in 2023. The assessment must establish what happens when settlement ponds reach capacity while runoff continues throughout the development's drainage network.

The concern extends beyond sediment escaping overflowing ponds. If pond embankments or surrounding peat lose stability, retained water and mobilised peat can be released together and flow downhill into existing water channels. Roads and their drainage systems must be included when assessing where those flows accumulate and discharge.

TOBIN's Part 2 response, Section 2.1.2.1, printed pages 5–6, describes 25 settlement ponds, maintenance and inspections after intense rainfall. That passage does not demonstrate safe overflow routes or the downstream consequences of combined water-and-peat releases across the entire wind farm, including its roads, during a prolonged mountain storm.

Same-day river-flood record - 30 January 2026

All photographs on these two comparison pages were taken by Joseph Sheerin on the same day. They show different parts of the receiving river network during the same flood episode. Several were taken while water was receding, approximately 24 hours after flooding; they do not record a common peak level.

Lattone River



Floodwater viewed from Raheelin Road bridge, below the cascade stretch.

Sraduffy River, Kiltyclogher



Continuing flow through the village after the flood event.

County River towards Lough Melvin



Receiving channel near the lake; water was already receding.

Kilcoo confluence outside Kiltyclogher



Junction identified locally as the Sraduffy, Kilcoo and County River channels.

Source: Joseph Sheerin photographic evidence. River names, directions and locations follow the observer's local identification. Each panel represents a distinct river or headwater location.

Same-day river-flood record - 30 January 2026 (continued)

All photographs on these two comparison pages were taken by Joseph Sheerin on the same day. They show different parts of the receiving river network during the same flood episode. Several were taken while water was receding, approximately 24 hours after flooding; they do not record a common peak level.

Raheelin headwater channel, below T1



Roadside stream and the channel immediately beside the road.

Northern Dough headwater channel



Stream beside farmland flowing towards the County River, not the Lattone, as identified locally.

Ballagh route / Rossinver Church



Converging channels at the church, on the Saddle Hill-Ballagh receiving route identified by the observer.

Manorhamilton receiving watercourse



Channel identified locally as receiving water from the Faughery side towards the Lough Gill system.

Source: Joseph Sheerin photographic evidence. River names, directions and locations follow the observer's local identification. Each panel represents a distinct river or headwater location.

2.1 Lattone River headwaters and waterfalls: omitted receiving environment

I identify the source of the Lattone River in box 93 near the top of the OS map. The headwater ground lies at the edge of, or outside, the red line identifying the Study Area. Proposed turbine T1 is nearby. The relationship between its construction, associated drainage and these headwaters is therefore a specific assessment issue. My concern is that the EIAR material reviewed for this submission does not describe the ground conditions at this source or adequately examine the connected riverbank, waterfalls and downstream pathway.

I have walked as far as the bank of the Lattone River. The waterfall is hidden by overgrowth, but I could hear it roaring from the riverbank. There are numerous falls along this stretch, after which the river passes beneath a bridge carrying the road. The overgrown cascade stretch cannot be properly surveyed from the accessible riverbank, and the waterfalls cannot be approached safely. In flood conditions, the channel becomes a torrential cascade. Peat, sediment or other pollutants entering it will mix with the turbulent water and be propelled downstream towards the County River. The reports identify no practicable means of stopping or containing that material once it enters this system.

This is a critical limit on reliance upon inspection, notification or emergency intervention after a release. Personnel cannot safely approach the waterfall and flooded cascade to intercept contaminated water or mobilised peat. The assessment needed to establish the upstream sources, flood pathways and consequences before relying upon downstream response measures.

Coillte owns the access road leading up to this area. I am not aware of any restriction preventing the company from approaching and studying the site by that road. Access to the general area must be distinguished from safe access to the riverbank during a flood. The reports do not explain why these headwaters, falls, bridge crossing and ground conditions were not examined and described, or identify the survey limitations and alternative methods used for the inaccessible stretch. Difficulty undertaking a conventional bankside survey does not establish that these features or their downstream risks are absent.

Whether these waters lie beside or outside the red line does not remove them from the receiving environment. The assessment must follow the connected catchment and the route by which peat and pollutants reach downstream waters. A Study Area boundary is not a barrier to floodwater or contamination. Omission of the Lattone headwaters, closely spaced waterfalls and inaccessible response locations leaves the claimed storm-overflow and pollution controls unsupported. This reinforces my request for refusal.

The following Lattone plate shows the Coillte road, T1 setting and limits of safe access. The separate comparison beside the wind-farm-wide storm discussion brings together different rivers and headwater locations photographed on the same day, 30 January 2026. These form one flood record, rather than separate events; some waters were already receding.

Local evidence and map identification: Joseph Sheerin. The source location is identified by reference to OS map box 93; the exact relationship with the Study Area boundary must be read from the lodged mapping.

Lattone River: T1 setting and limits of access

The road approach is accessible, but overgrowth and the river's steep, flooded channel restrict inspection of the falls. These photographs record the local setting described in Section 2.1.



T1 setting and Coillte road

I identify T1 in the forestry to the right and the Lattone River to the left. Coillte owns the approach road.



Overgrowth beside the road

Dense roadside vegetation obscures the river corridor and restricts access from the road.

Closest safe approach to the flooded Lattone River



This is the closest point I could reach safely. I could hear the waterfall roaring, but overgrowth hid it and I could not safely approach the falls.

Photographs: Joseph Sheerin, 30 January 2026. Locations and proposed T1 position identified by the observer; the lodged layout establishes the precise turbine location.

3. Alteration of the mountain’s natural drainage during prolonged storms

Dough Mountain’s upland bog, plateau, steep slopes and water channels form a connected drainage system. My concern is the change to that system when the development introduces turbine foundations, hardstands, roads, drains, borrow pits and other infrastructure below the mountain.

These works will change where rainfall infiltrates, accumulates and flows. Compacted and impermeable surfaces will redirect runoff, while excavations and drainage will alter the surrounding bog’s water regime. The assessment must address water arriving from the upland ground above the development, together with rainfall falling on the development itself.

TOBIN’s Part 2 response, Section 2.1.2.1, printed pages 5–6, proposes 25 settlement ponds. Their number does not demonstrate that the altered drainage system will safely manage sustained mountain-storm runoff. The assessment must establish what happens when these ponds fill, how continuing floodwater passes through the entire road and drainage network, and whether overflow will erode or destabilise peat before reaching surrounding watercourses and Lough Melvin.

I challenge the conclusion that these measures provide adequate protection without a demonstrated assessment of the whole connected mountain catchment, prolonged rainfall, safe overflow routes and combined peat-and-water failure. This unresolved risk supports my objection to the development and request for refusal.

The turbine foundations introduce solid concrete structures into the ground. Rainwater cannot infiltrate through the concrete and must move around it. Roads and hardstands introduce additional compacted surfaces, while roadside drains collect and redirect runoff. These changes must be assessed together with their effects on surface water and shallow groundwater.

TOBIN must demonstrate how this altered drainage system will behave during prolonged mountain storms, including when the 25 settlement ponds reach capacity. The assessment must cover the entire wind farm and its roads, the upland water entering from Dough Mountain, and the downstream overflow routes to surrounding watercourses and Lough Melvin.

4. Inadequate assessment of the connected mountain catchment

My concern is that the hydrological assessment has not adequately accounted for water entering the development from Dough Mountain’s plateau, bog, steep slopes and drainage channels. The assessment must encompass these contributing areas, together with the concrete foundations, compacted roads, hardstands, excavations and drainage systems that will alter water movement below them.

TOBIN’s Part 2 response, dated 25 September 2026, Section 2.1.2.1, printed pages 5–6, describes 25 settlement ponds but does not, in that passage, provide the catchment

calculations demonstrating their performance during prolonged mountain storms or the consequences of overflow and ground failure. Referencing mitigation measures does not resolve whether the study area captures the complete hydrological system.

I maintain that this unresolved assessment deficiency supports refusal of the Grid Planning Application, which forms part of the same project and relies on the shared EIAR and NIS.

5. Reliance on inspection and intervention during severe weather

During Storm Éowyn, conditions prevented safe access to the affected mountain areas. The assessment must therefore address circumstances in which contractors cannot reach settlement ponds, drains, stockpiles or unstable ground to inspect, clear or repair them.

TOBIN's Part 2 response, dated 25 September 2026, Section 2.1.2.1, printed pages 5–6, relies on weather forecasts, suspension of works, maintenance and inspections following intense rainfall. Suspending work does not stop rainfall, runoff or erosion from ground already excavated or disturbed. Inspection after a storm cannot prevent a release that occurs during it.

Across the proposed two-year construction period, the drainage and pollution controls must remain effective during prolonged storms without depending on immediate human intervention. The assessment must demonstrate their capacity, safe overflow arrangements and stability under the climate-change rainfall allowances adopted for the project.

The response does not demonstrate, in this passage, how downstream waters will remain protected when severe weather prevents access and continuing runoff overwhelms or damages the controls. This remains a substantive ground of objection.

TOBIN's reliance on inspections and emergency notification does not demonstrate how excess water will be physically managed when settlement ponds reach capacity. A site visit records conditions; informing the authorities reports an incident. Neither measure contains floodwater, stabilises moving peat or prevents contaminated runoff reaching downstream watercourses.

The assessment must identify and demonstrate safe overflow routes and protection that remains effective when access and intervention are impossible. Without that evidence, monitoring and notification cannot substantiate the claimed effectiveness of the mitigation.

6. Groundwater vulnerability and slope stability — departures from IFI's recommendations

In TOBIN's Part 2 response, dated 25 September 2026, Section 2.1.3, printed pages 7–8, IFI recommends avoiding turbine and main construction works in areas of high or greater groundwater vulnerability and locating all construction, including roads, within low landslide-susceptibility areas.

TOBIN declines both restrictions. On groundwater vulnerability, it states that avoidance would severely limit development within the site boundary. That is a development constraint; it does not itself demonstrate environmental protection. The response must substantiate why construction in these sensitive areas will remain safe, including during prolonged rainfall, accidental releases and interaction with unidentified karst pathways.

On landslide susceptibility, TOBIN relies on site-specific investigations and stability calculations rather than GSI screening alone. Those calculations must be examined against the whole connected landscape, including upland water entering the development, road excavations and drainage, settlement ponds, material storage and downstream consequences. The stated Overdesign Factors above 1.0 do not, by themselves, establish that every relevant failure mechanism and storm condition has been assessed.

This connects directly to my concern about the 25 settlement ponds: monitoring, future method statements and stopping work cannot replace demonstrated stability and safe management of continuing storm runoff when intervention is impossible.

I therefore challenge TOBIN's conclusion that its mitigation adequately resolves the risks identified by IFI. These departures require substantive justification and support my request for refusal where that justification is not established.

7. Upland drainage, peat stability and downstream consequences

TOBIN's Part 2 response, dated 25 September 2026, printed pages 9–10, quotes the AGL review describing the development on the lower slopes of Dough Mountain, with streams originating on the steeper upper slopes. This confirms that the ground beneath the proposed infrastructure receives water from the mountain above it. The assessment must therefore account for that contributing catchment, including areas outside the construction footprint.

The review also identifies deeper peat around T1–T3 on Saddle Hill and localised deeper deposits along access tracks and crane hardstands, including T5 and T8. It records five historic peat landslides and two historic scree landslides. These findings require location-specific examination alongside the proposed excavation, drainage, roads, settlement ponds and peat storage.

TOBIN describes conservative reductions in measured peat strength and a temporary one-metre peat surcharge in its calculations. Those precautions do not answer whether

the calculations encompass the full upland water contribution, prolonged storm conditions and the consequences of drainage or containment failure. These are separate matters that must be demonstrated.

The response states that excess peat will be deposited below existing ground level in borrow pits. That arrangement requires evidence of the pits' drainage, water levels, storage stability and overflow behaviour during prolonged rainfall. Placement below ground level does not itself establish safe containment.

Finally, future method statements, daily sign-off and suspension of works depend on management and access. They do not prevent continuing runoff through already disturbed ground during a storm.

I therefore challenge the adequacy of the assessment of the complete connected landscape and maintain my request for refusal. The quoted review's overall low-risk opinion must be tested against these specific pathways and failure scenarios, rather than treated as resolving them automatically.

The review identifies numerous erosion scars and attributes historic slides to heavy or sustained rainfall and concentrated groundwater beneath peat. It nevertheless concludes that the recorded slides had short runout and low impact. That conclusion must be tested against the altered drainage and downstream pathways created by this development.

Roads will act as a "barrage" supporting upslope peat. This expressly recognises that roads will change the physical behaviour of the slope. The assessment must demonstrate how water passes through or around these structures without accumulating or being concentrated at vulnerable discharge points.

The proposed drains are intended to prevent groundwater accumulation, concentrated seepage and hydrostatic pressure during heavy rainfall. Their effectiveness therefore needs supporting catchment calculations, capacities and safe overflow arrangements.

The review expressly says primary design measures—not monitoring or emergency response—reduce the risk. The objection should consequently challenge whether those design measures have been demonstrated for the actual terrain, complete material quantities and prolonged storm conditions.

I challenge the adequacy of that demonstration and maintain my request for refusal of the Grid Planning Application. General drainage details and an assurance of sufficient borrow-pit capacity do not resolve the complete project's material-storage and hydrological risks without the supporting calculations.

8. Concrete chute washing and contaminated water

IFI recommends that concrete trucks must not wash out on site because cement and wet concrete are extremely toxic to aquatic life. TOBIN nevertheless confirms that chute washing will take place on site in a bunded area; only drum washing will occur at the batching plant.

The issue is therefore the containment and disposal of contaminated chute-wash water during heavy rainfall. The assessment must establish the washout location, containment capacity, protection against rainwater ingress and overflow, and disposal arrangements. A reference to bunding alone does not demonstrate that this contaminated water will remain isolated from drains, watercourses and groundwater during prolonged mountain storms.

Source: TOBIN Part 2, Section 2.1.3, IFI Recommendation No. 7, printed pages 6–7, referring to EIAR Section 8.4.3. Section 2.2.1, printed page 14, also describes impermeable lined facilities for concrete washout waters.

9. Downstream receiving conditions and Northern Ireland waters

My photographs of 30 January 2026 document conditions in the receiving river system approximately 24 hours after flooding, while water was receding. These waters receive drainage from the upland area surrounding the proposed development and connect with downstream waters towards Lough Melvin.

Pollution entering this connected system would not remain confined to the application boundary or stop at the border. The assessment must establish its downstream extent, duration and consequences for Northern Ireland waters and protected ecological receptors under prolonged storm conditions.

TOBIN’s Part 2 response, Section 2.2.1, printed pages 13–14, predicts that mitigation will prevent adverse effects. That prediction must be demonstrated against the actual receiving conditions and the consequences of containment failure.

My photographs of 30 January 2026 record flowing water approximately 24 hours after the flooding, while floodwater was receding. They document channels below the proposed development and downstream receiving waters, including the County River towards Lough Melvin. The northern Dough stream shown beside farmland flows towards the County River, not the Lattone River, according to my local identification.

My concern is that sediment or contaminated water escaping the development would enter these channels and join other catchment waters from Leitrim and Fermanagh. The assessment must examine that transport and mixing during prolonged storms, rather than assume that downstream dilution establishes protection.

This evidence is directly relevant to TOBIN’s Part 2 response, Section 2.2.1, printed pages 13–14. The existing downstream pathways must be distinguished from TOBIN’s prediction that mitigation will prevent adverse effects.

Acknowledged transboundary pathway — reliance on mitigation

TOBIN's Part 2 response, dated 25 September 2026, Section 2.2.2, printed pages 15–16, records NIEA's requirement to assess direct and indirect effects on Northern Ireland's sensitive ecological receptors, recognising that river-basin ecological functions cross jurisdictional boundaries.

TOBIN expressly identifies Lattone 35_010 as a potential pathway for likely significant effects between the proposed wind farm and Lough Melvin SAC (NI) and ASSI. Its conclusion of no significant residual effects therefore depends on the effectiveness of the proposed mitigation; it does not establish the absence of a connection.

My photographs and local drainage evidence must be considered when testing that conclusion. The assessment must demonstrate protection during prolonged rainfall, settlement-pond overflow, drainage blockage and ground instability across the contributing catchment. Clear-span bridges avoid in-stream construction at the crossings, but do not themselves prevent contaminated runoff entering watercourses elsewhere.

Table 2-1, printed page 15, principally directs NIEA to existing documents and assurances of compliance. Those references must be supported by the location-specific evidence and calculations establishing that the controls protect the downstream receiving environment under the conditions identified in this submission.

I maintain my request for refusal of the Grid Planning Application because the shared assessment's claimed protection must be demonstrated for the complete project and its connected transboundary waters.

Aquatic pollution controls must match the actual risk

TOBIN's Part 2 response, dated 25 September 2026, Section 2.2.3, printed page 16, records NIEA's requirement for pollution controls proportionate to the risks of individual activities. Describing measures as "tried and tested" and providing for later contractor revisions does not itself demonstrate their effectiveness under the site's particular peat, karst, slope and storm-runoff conditions. The assessment must substantiate protection against sediment, cement, grout and fuel releases throughout construction and thereafter.

TOBIN's concluding response does not resolve the identified deficiencies

TOBIN's Part 2 response, dated 25 September 2026, Section 3, printed page 17, concludes by setting out the project's anticipated electricity output and contribution to energy and climate objectives. Those benefits do not demonstrate sufficient borrow-pit capacity for grid excavation material, safe management of prolonged storm runoff, peat stability or effective protection of connected downstream waters.

I maintain my request for refusal of the Grid Planning Application on the substantive assessment deficiencies identified above.

Plate LC1 - Lattone–County River confluence



The labelled photograph shows the Lattone River joining the County River, as identified by Joseph Sheerin. This records the connected receiving environment addressed in TOBIN’s Part 2 response, Section 2.2.2, printed pages 15–16.

Photograph by Joseph Sheerin, 13 May 2021. These confluence and bridge photographs are separate from the January 2026 flood record.

Plate LC2 - Community crossing into County Fermanagh



The bridge across the County River near the confluence is identified by Joseph Sheerin as a crossing into County Fermanagh. It illustrates the physical link between communities on both sides of the border.

Photograph by Joseph Sheerin, 13 May 2021. These confluence and bridge photographs are separate from the January 2026 flood record.

10. Transboundary water protection — unresolved catchment and mitigation evidence

TOBIN's Part 2 response, dated 25 September 2026, Section 2.2.1, printed pages 13–14, identifies T1–T5 as draining towards Lough Melvin. It therefore acknowledges a hydrological connection to downstream transboundary waters.

TOBIN then states that, because no adverse effects are predicted in adjacent sub-basins, there is "no mechanism" for significant downstream effects. The drainage mechanism exists; the disputed issue is whether the proposed controls reliably prevent harmful releases through it. The conclusion depends on demonstrating their effectiveness.

My photographs of County River flooding on 30 January 2026, following continuous rainfall and taken while floodwater was receding, provide local evidence relevant to that assessment. The assessment must address prolonged rainfall, incoming upland runoff, settlement-pond capacity, safe overflow routes and circumstances in which storm conditions prevent intervention.

Existing water quality: "Good" status does not demonstrate that the development's controls will work. In Section 2.1.2, TOBIN already accepts IFI's warning that this classification does not exclude local forestry impacts and that some classifications rely on modelling.

Treatment performance: The assertion that all infrastructure runoff passes through ponds and contaminants are removed requires evidence for overflow conditions and the particular contaminants involved. Settlement is not, by itself, proof of complete contaminant removal.

Whole-project coverage: This section describes the wind farm's drainage controls. Its statement that the grid lies in the Bonet subcatchment does not establish equivalent protection along the grid route or account for grid excavation material brought to the borrow pits.

Monitoring: Continuous turbidity monitoring and sampling provide information. They do not themselves contain a release, and stopping works does not stop runoff from disturbed ground.

I challenge the conclusion that transboundary water risks have been comprehensively resolved and maintain my request for refusal of the Grid Planning Application.

11. Aquatic assessment, the grid route and the Council's quoted conclusion

TOBIN's Part 2 response, Section 2.1.1, printed page 3, identifies Aquatic Sites 15, 17, 22, 24 and 27 along the Grid Connection Route as highly suitable for salmon, with Atlantic salmon identified at Site 15, the proposed off-road HDD Site 1.

The statement that vegetation removal for launch pits more than 50 metres from watercourses creates no potential for siltation or sedimentation must be tested against

the full works, including excavation, drainage, dewatering and drilling operations. Separation of vegetation removal alone does not demonstrate protection from every construction pathway.

The response lists SuDS measures and two hydrocarbon interceptors within the wind farm, together with silt fences at wind-farm crossings and the two grid HDD sites. The complete route-specific protection must be demonstrated rather than inferred from measures located within the wind farm.

The response states that Ballagh_010 supports salmon and brown trout spawning grounds but is not hydrologically connected to the survey area for the proposed wind farm site. This statement must be examined against my separately identified and photographed Saddle Hill flash-flood pathway joining the Ballagh River and flowing towards Lough Melvin. Dooard Bridge is a separate photographic location and does not replace that Ballagh identification.

Part 2, Section 2.1.1.1, printed pages 3–4, quotes the County Council's favourable conclusion from Section 20.2 of its Chief Executive's Report. That quoted opinion does not supply missing route-specific survey evidence or resolve the particular drainage pathways and receiving conditions identified in this observation.

TOBIN's first response, dated 9 September 2026, Section 2.2.45, response Item 7, printed pages 121–122, expressly confirms that no dedicated bird surveys were undertaken for the Grid Connection Route or Turbine Delivery Route accommodation areas. It relies on a desk-study buffer and incidental observations during other surveys. The survey evidence for the complete project must be examined on that stated basis. References to bat surveys during those other surveys do not, on their own, establish dedicated bat coverage of every grid-route habitat or structure.

12. Photographic evidence and determination requested

The following photographs are a sample of receiving-water conditions, taken by Joseph Sheerin on 30 January 2026, approximately 24 hours after flooding and while floodwater was receding. They do not show peak flood conditions.

The locations and upstream connections are identified from my local knowledge. The photographs show channel conditions and landscape context; they do not quantify discharge, pollutant concentrations or the proportion of water originating within the application boundary.

I request that this examination of TOBIN's Part 2 response and the associated photographic evidence be considered with the existing grounds in this submission, placed before the wind-farm case officers and inspectors, and assessed as evidence concerning the single project supported by the shared EIAR and NIS.

I request refusal of the Grid Planning Application for the unresolved deficiencies identified, including the failure to reconcile grid excavation material with borrow-pit storage and the failure to demonstrate protection of the connected receiving environment under prolonged storm conditions.

Saddle Hill: surrounding blanket bog and observed ground conditions

These photographs show the blanket bog and slopes surrounding the proposed T2, T3 and nearby borrow-pit area. The development must be assessed in relation to this adjoining peatland, including water arriving from higher ground and the effects of excavation, drainage and material storage.

The construction footprint does not define the extent of the environmental risk. TOBIN must demonstrate how the surrounding blanket bog has been included in its assessment of drainage changes, erosion and peat instability.

The following photographs also record exposed and locally collapsed peat banks, detached peat blocks, standing water and surface runoff entering drainage channels. They include an opening identified by the observer as a sinkhole.

This evidence must be reconciled with TOBIN’s Part 2 review, printed pages 9–12, concerning peat stability and drainage around T1–T3, Borrow Pit 1 and associated roads. The assessment must address these actual ground conditions and their connected drainage pathways before relying on proposed works to reduce instability risk.

Photographs by Joseph Sheerin. Dates are not assigned where not confirmed. The following Ballagh River sequence is separate from the January 2026 flood record.

Plate SP1 - Saddle Hill: adjoining bog, forestry and track



View identified by the observer as overlooking the T1 area. The visible relationship between upland bog, forestry and the track supports examination of contributing ground. Exact turbine positions and designated boundaries must be read from the application maps.

Plate SP2 - Saddle Hill: peat-covered incline



The photograph records the adjoining peat-covered slope. It is evidence of visible terrain and habitat, rather than a measurement of engineering stability.

Plate SP3 - Saddle Hill: wider blanket-bog landscape



Wider view identified by the observer as overlooking Lough Melvin, showing adjoining upland habitat and landscape context.

Plate SP4 - Relationship with the neighbouring Dough uplands



The observer identifies the proposed T5 area in the background. The photograph shows the wider upland setting; precise infrastructure positions require the lodged layout.

Plate SP5 - Saddle Hill: exposed and locally collapsed peat bank



Exposed peat, cracks and displaced blocks photographed by Joseph Sheerin. The source photograph is dated 26 May 2026.

Plate SP6 - Saddle Hill: water below an exposed peat bank



Standing water at the foot of exposed peat records the ground condition observed at the time of photography.

Plate SP7 - Pooling and forestry context



The photograph shows pooled water and the broader relationship with surrounding forestry and upland terrain.

Plate SP8 - Saddle Hill: opening identified by the observer



An opening identified by Joseph Sheerin as a sinkhole. Its origin and underground extent require investigation; the photograph alone does not establish a karst connection.

Plate SP9 - Saddle Hill: surface water entering a channel



Visible flowing water illustrates the need to assess runoff pathways. The photograph does not quantify discharge or establish contamination.

Plate SH2 — Channel and surrounding land



Saddle Hill drainage channel beside the cottage. This begins the photographed route towards the Ballagh River and Rossinver Church, identified by Joseph Sheerin.

Photograph supplied by Joseph Sheerin. The drainage identification is the observer’s local account. These earlier photographs are separate from the flood photographs dated 30 January 2026.

Plate SH4 — Watercourse crossing the R282



Channel descending from Saddle Hill across the R282 towards the Ballagh River. The following large photographs continue the route to Rossinver Church.

Photograph supplied by Joseph Sheerin. The drainage identification is the observer’s local account. These earlier photographs are separate from the flood photographs dated 30 January 2026.

Plate SH5 — Flash-flood channel through farmland



Water from Saddle Hill passes through grazing land and turns towards the Ballagh River, as identified by the observer. The church receiving waters follow.

Photograph supplied by Joseph Sheerin. The drainage identification is the observer’s local account. These earlier photographs are separate from the flood photographs dated 30 January 2026.

Saddle Hill to Ballagh River: receiving waters by Rossinver Church

Saddle Hill → Ballagh River → Rossinver Church → Lough Melvin



The channels near Rossinver Church on the Lough Melvin side, showing water arriving from the Dough Mountain and Rossinver directions. This is the church location in my local account of the connected Saddle Hill-Ballagh receiving route. It is shown here at full size, immediately after the Saddle Hill channel photographs.

The same church view is retained once in the grouped comparison of rivers photographed in flood. This large plate allows the receiving channel and its surrounding ground to be examined alongside the upstream Saddle Hill evidence.

Photograph: Joseph Sheerin, 30 January 2026. The upstream Saddle Hill route photographs are separate earlier views; they show the drainage route rather than the same day's flood conditions. Locations and pathway are identified by the observer.

Part B | Plate B1 - Existing nesting bank



The exposed natural nesting bank identified by the observer as the established sand martin colony. The photograph records visible bank conditions and openings; long-term colony use is the observer’s local evidence.

Source: Joseph Sheerin photographic evidence; original file: 688A5807 Sand Martins Nests 1.jpg

Plate B2 - Cliff and access road



The exposed slope immediately adjoining the road ascending Dough. This illustrates why nesting habitat, slope conditions, road safety and proposed construction effects require examination together. The observer identifies this as the sole summit access route.

Source: Joseph Sheerin photographic evidence.

Plate B3 - Approach to the exposed slope



Wider view of the access-road approach, exposed bank and adjoining woodland. The photograph provides visible landscape context; it does not alone establish ground stability or the engineering footprint.

Source: Joseph Sheerin photographic evidence.

Plate B4 - Upper slope and surrounding landscape



View from the upland towards the forestry and wider receiving landscape. The observer identifies the nearby proposed T8 and borrow-pit setting. Precise positions must be read with the applicant’s final layout, not inferred from this unlabelled photograph.

Source: Joseph Sheerin photographic evidence; original file: OverlookingBorrow Pit and T8.jpg

Part C - Detailed grounds and evidence

The following detailed grounds retain the substantive text, engineering review, maps and photographic evidence. Read them with the location-specific findings and updated survey evidence presented in Part A. Historical evidence dates and original source references are retained.

Summary of the Main Reasons for Refusal

This submission objects to the proposed permanent 110 kV substation at Faughary and the approximately 32 km underground Grid Connection Route to Srananagh. The objection is based on the applicant's own documentation, the common EIAR and NIS, the grid SID application material, EirGrid's strategic North-West transmission work, and the consultation record. The objection is not confined to errors, omissions or inconsistencies in official records, reports and application documents. Just as important is the physical development itself: the permanent substation, underground cable route, trenches, joint bays, river and culvert crossings, access and working areas, drainage, telecommunications mast and associated construction activity, together with their direct, indirect, downstream and cumulative effects on land, peat, groundwater, rivers, protected habitats, fish, White- clawed Crayfish, birds, residents, farms and businesses. Documentary shortcomings matter because they may prevent those real physical effects from being fully identified and assessed before permission is decided.

The applicant expressly states that the wind farm and Grid Connection are functionally interdependent and constitute a single project for Environmental Impact Assessment. The Non-Technical Summary also states that the entire proposed project is assessed in the EIAR accompanying both planning applications. That choice has consequences: deficiencies affecting the grid component cannot be insulated from scrutiny merely because a separate statutory application was used.

Permission should be refused because the submitted material does not demonstrate, with the necessary route-specific certainty, that this permanent 32 km development is environmentally, hydrogeologically, geotechnically and strategically suitable. Fundamental matters remain dependent on later investigation, while the applicant's own evidence demonstrates karst groundwater connectivity, long groundwater flow paths, sensitive river/SAC crossings, invasive-species risk, road-safety constraints and an evolving strategic transmission context. The detailed Aquatic Report, NIS, EIAR Chapter 8, scoping responses, habitat-condition report and lodged engineering drawings disclose further material baseline gaps, contradictions and deferred-design matters. In particular, the current- layout aquatic baseline is incomplete, full access was not obtained at six Grid Connection survey locations, no current-layout electrofishing was carried out, and upstream Wind Farm survey Sites 1–12 cannot be excluded from the assessment merely because they lie within another application boundary.

Evidence: Grid application: wind farm and grid are functionally interdependent/single EIA project; NTS: entire proposed project assessed in EIAR accompanying both applications.

The Ó Gríanna Whole-Project Principle

In Ó Gríanna v An Bord Pleanála [2014] IEHC 632, the High Court examined a wind-farm permission where the environmental effects of the necessary grid connection had not been assessed with the turbine development. Peart J held that “the construction of the wind turbines themselves and the connection to the national grid is a single project, and not two separate projects”. The Court treated the grid connection as an integral part of the overall development, found that the Environmental Impact Assessment was deficient because it did not include a cumulative assessment of the turbines and connection works, and quashed the permission.

The judgment does not establish that the use of two planning applications is automatically unlawful. Its controlling significance is that administrative separation does not divide the environmental project. Before development consent is granted, the competent authority must possess sufficient information to identify, describe and assess the direct, indirect, cumulative and interacting effects of the complete functioning project, including the infrastructure without which the wind farm cannot operate.

The principle applies directly here. The applicant expressly states that the Lissinagroagh Wind Farm and the 110 kV Substation and Grid Connection Route are functionally interdependent and constitute a single project for EIA, and it relies upon a common EIAR and NIS. The approximately 32 km Grid Connection has no identified independent purpose apart from transmitting the electricity produced by the Wind Farm. The Wind Farm, onsite electrical system, substation, telecommunications mast, Grid route, joint bays, bridge and culvert crossings, HDD operations, construction compounds, haulage, waste movements and proposed transfer of Grid arisings to the Wind Farm borrow pits must therefore be assessed as parts of the complete project.

The later Grid documents disclose environmental and engineering information that was not available to the public or decision-makers when the Wind Farm application was lodged, including the proposed transfer of Grid excavation material to the Wind Farm borrow pits and the detailed scale of the route, crossings, HDD works and deferred investigations. Under the Ó Gríanna principle, that later information cannot be confined to the Grid file. It bears directly upon the adequacy of the whole-project EIA and upon the capacity, traffic, peat, stability, karst, hydrology, ecology, pollution and permanent-restoration conclusions supporting the Wind Farm application.

I request that this submission and the later Grid information be brought to the attention of the officials dealing with the related Wind Farm application. This is not a request that both applications be processed or determined at the same time. The evidence presently supplied remains insufficient, and permission should be refused rather than fundamental investigation being postponed to conditions, detailed design or contractor method statements.

Executive Statement and Requested Decision

This submission requests refusal of the permanent 110 kV substation, approximately 32 km underground Grid Connection Route, 23 m telecommunications mast, joint bays, bridge and culvert crossings, HDD works, compounds and ancillary development. The applicant expressly states that the Wind Farm and Grid Connection are functionally interdependent and constitute a single project, and that the EIAR and NIS accompanying the applications pertain to the overall project.

The submitted evidence does not provide the complete, location-specific and internally consistent assessment required before consent. The defects concern the project description, study boundary, material balance, borrow-pit capacity, peat and ground stability, karst and groundwater pathways, aquatic ecology, protected birds and bats, road safety, land control, emergency response and permanent post-decommissioning consequences. These matters cannot be repaired by contractor method statements, confirmatory surveys or planning conditions after permission.

The most recent official material exposes a central failure: the Grid methodology proposes that surplus Grid peat and spoil can be transported to the Wind Farm borrow pits, but the Wind Farm pits were assessed on the disclosed basis of Wind Farm construction requirements. The pre-application meeting records and SID Inspector’s Report do not record disclosure of the Grid material transfer, its quantity, receiving pit, haul route, combined capacity or permanent environmental consequences.

Summary of the Principal Grounds for Refusal

Ground	Finding
1. One project, incomplete combined assessment	The applicant admits functional interdependence, while material interactions between the Grid and Wind Farm were not assessed on one consistent final design.
2. Undisclosed use of Wind Farm borrow pits	No combined mass balance, remaining-capacity calculation, receiving-pit allocation, haul route, material-compatibility testing or alternative destination is supplied.
3. Restricted Study Area	The ownership-led boundary excludes connected Dough Mountain and Saddle Hill peat, springs, drainage, karst, headwaters and downstream receptors.
4. Peat, landslide and permanent repository risk	Overhanging peat, steep ground, storm damage, blasting, altered drainage and permanent mixed deposits were not assessed as a complete stability and runout system.
5. Karst and groundwater uncertainty	The underlying Polldough dye-trace report is absent; caves, swallow holes, conduits and the substation setting are incompletely investigated.
6. Aquatic and WFD failure	Earlier-layout electrofishing, incomplete access, partial water-quality coverage and absent route-specific crossing evidence cannot support screening the Grid out of detailed WFD assessment.
7. Birds, bats and mast	No dedicated Grid bird survey was undertaken; the mast perch risk, local Hen Harrier use, bats and route habitats were not completely assessed.
8. Deferred fundamental design	Joint bays, utilities, culverts, ground conditions, land requirements and several surveys remain for the contractor after consent.

Ground	Finding
9. Traffic and public-road risk	No complete Grid-to-borrow-pit haul route, road-capacity assessment, combined HGV calculation or cross-catchment wheel-wash system is supplied.
10. Public participation and cross-notification	Important Grid information arose after Wind Farm participation closed and must be placed before both case teams and made available for effective public scrutiny.

Request for Cross-Notification Between the Related Applications

The Commission is requested to place this submission and the later Grid material before the Inspector, officers and decision-makers dealing with the related Wind Farm application. The whole-project principle and the limits of this request are set out on page 62.

The applicant’s own description of the applications as one functionally interdependent project removes any basis for treating the Grid use of Wind Farm borrow pits, roads, compounds, staff and environmental controls as irrelevant to the Wind Farm decision.

Principal Refusal Issue: Grid Material and the Wind Farm Borrow Pits

The documented chain of facts

Stage	What was recorded	Material omission
Wind Farm application	Three pits assigned to rock supply, temporary storage, peat/spoil management and reinstatement for Wind Farm construction.	No quantified Grid-material allowance disclosed.
First Grid meeting — 27 January 2026	Route options and environmental topics discussed generally; clarification required.	No recorded Grid-to-pit transfer, quantity, route or capacity.
Second Grid meeting — 30 March 2026	Substation, joint/passing bays, c.10 m hedgerow removal and mitigation attribution discussed.	No recorded spoil transfer. Further in-depth discussion was said to be for a next meeting.
Closure — 28 May 2026	Applicant requested closure and supplied detailed description and layout.	No third meeting is recorded; the material-transfer system was not examined in the meeting record.
SID Inspector’s Report — 3 June 2026	Records 32 km cable, 30.6 km public road, 11 bridges, 10 HDDs, eight culverts, substation and mast.	No Grid-spoil destination, receiving pit, haul route or combined capacity.
Final Grid methodology	Surplus Grid peat and spoil can be used to reinstate Wind Farm borrow pits.	No whole-project material balance, certification, segregated cells or permitted backup destination.

Capacity and feasibility failure

The Wind Farm pits were processed on the disclosed basis of Wind Farm material. The Grid subsequently introduced trench spoil, joint-bay material, HDD arisings, culvert and utility excavations, road material and off-road soil. No evidence demonstrates that total safe capacity is at least equal to Wind Farm material plus Grid material plus restoration requirements and contingency.

If the pits cannot safely receive the Grid material, no assessed alternative destination is identified. If they receive it, the Wind Farm EIAR understated the quantities, traffic, contamination pathways, settlement, drainage and permanent effects. Either outcome

removes the evidential basis for consent.

Scientific certification and material compatibility

No identified report certifies that Borrow Pits 1, 2 and 3 are suitable for combining Wind Farm peat, soil and rock with Grid material excavated from public roads, agricultural land, forestry, HDD pits, culverts, drains and utility locations. Ground and geophysical investigations assessed selected construction conditions; they did not characterise the complete imported Grid stream or certify its chemical, biological and geotechnical compatibility.

Required examination	Evidence identified
Combined Wind Farm and Grid mass balance	Not provided.
Route-wide chemical and waste classification	Not demonstrated.
Compatibility, compaction and differential-settlement testing	Not demonstrated.
Leachate and karst-groundwater assessment	Not demonstrated.
Invasive-species clearance for each source	Incomplete route coverage.
Named independent acceptance certification	Not identified.
Load-by-load origin, testing and destination-cell record	Deferred to future management.
Lawful alternative destination	Not identified for the complete surplus stream.

Landscaping and the closed on-site undertaking

The Wind Farm documents undertake that excavated material will remain and be reused within the site and that peat will be used to batter and landscape turbine bases, crane hardstandings and platforms. Importing Grid material changes that closed material balance. No auditable movement schedule excludes mixed Grid material from landscaping, demonstrates separation of clean peat, or identifies acceptance criteria and storage cells.

Material suitable as structural fill is not automatically suitable for ecological reinstatement. Peat suitable for revegetation is not automatically suitable as structural fill. Road aggregate, asphalt fragments, cement-bound material, culvert sediment, HDD residues and material carrying invasive species cannot be presumed suitable for permanent placement around turbines or within peat-filled pits.

Permanent consequences after decommissioning

Surface reinstatement does not make a borrow pit temporary. The excavated void, altered bedrock, changed drainage and deposited material remain permanently. After the turbines and above-ground equipment are removed, rainfall and groundwater will continue to enter the fill. Mixed organic and mineral materials will continue to settle, crack, saturate, erode and leach.

Pollutants will not remain within the borrow pits or red-line boundary. Surface runoff, groundwater movement and karst drainage will transport fine sediment, hydrocarbons, cement residue, road contaminants, drilling residues and invasive material into surrounding blanket bog, springs, headwater channels, underground conduits and downstream waters. The application supplies no permanent monitoring period, responsible body, access arrangement, remediation mechanism or financial security for effects emerging after decommissioning.

Requested finding on the borrow-pit omission

The proposed shared material system was not transparently disclosed and scientifically assessed before the two applications were processed. It changes the function and risk profile of the pits, undermines the Wind Farm material undertaking and leaves the Grid without a demonstrated lawful and feasible spoil destination. This is a principal ground for refusing the Grid application and for referring the matter immediately to the Wind Farm case team, Leitrim County Council and the relevant environmental authorities.

The Complete Dough Mountain Environmental Setting Omitted from the Assessment

The following annotated drone photograph was taken on 3 October 2026. It provides the environmental context missing from the applicant's fragmented assessment. In one view it shows the observer- identified relationship between Lough Melvin SAC, Dough Mountain NHA, the existing Faughery Wind Farm, proposed T7 and T8, the cave, the karst depression or swallow hole, the Storm Eowyn windthrow area and the wider proposed wind-farm setting. The sole narrow summit road visible in the photograph is also the construction route to the turbine works and is therefore part of the development's primary access, ground-disturbance and emergency-response risk.



Drone Plate 1 Annotated overview of Lough Melvin SAC, Faughery Wind Farm, proposed T7 and T8, the cave, swallow hole, Dough Mountain NHA and Storm Eowyn windthrow. Locations are identified by the observer from

planning maps, local knowledge and site observations.

The photograph demonstrates that the proposed turbines, cave, swallow hole, damaged forestry, Dough Mountain upland ground and Lough Melvin SAC cannot be assessed as isolated features. They form part of one continuous topographical, hydrological and hydrogeological setting. Surface runoff, groundwater entering the karst system, sediment released by excavation or tree removal, and material displaced during a ground-failure event do not stop at the Wind Farm or Study Area boundary.

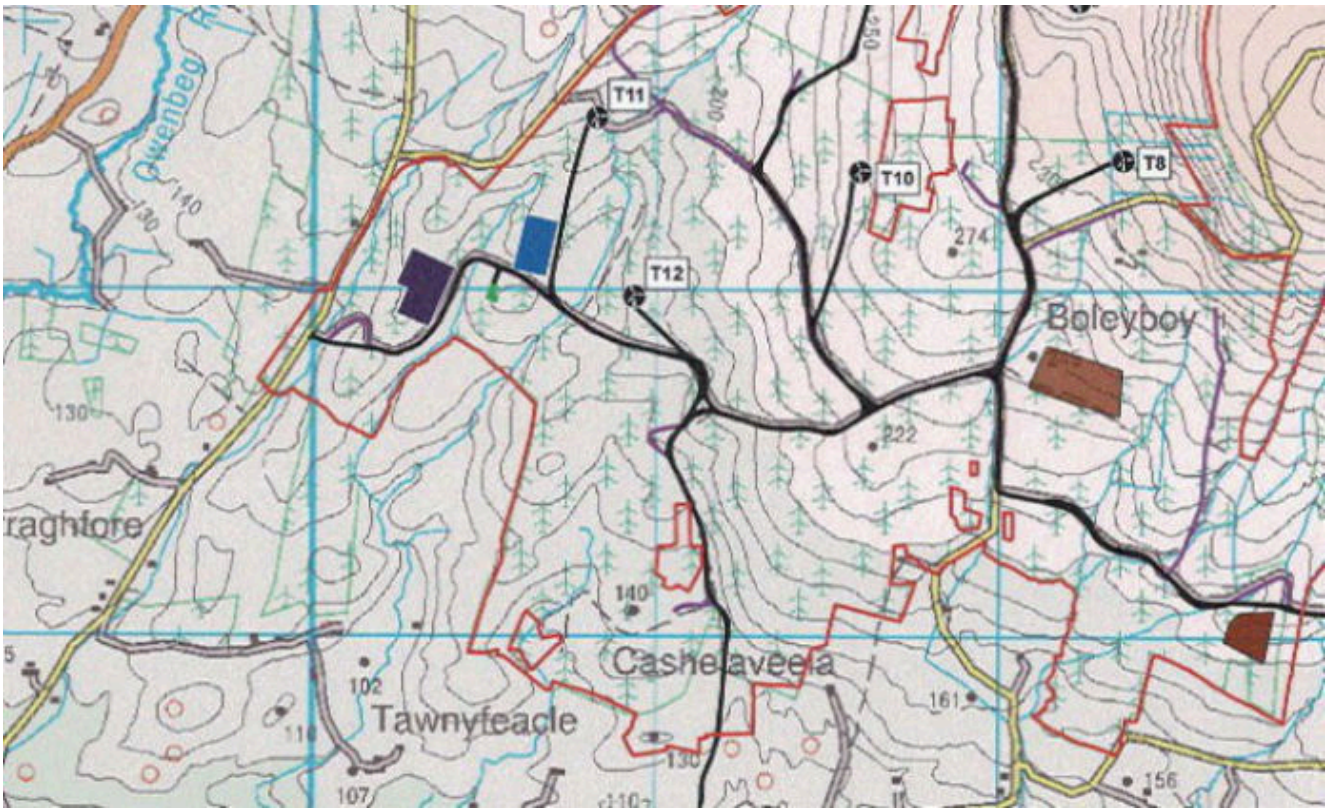
The image does not, by itself, establish the exact underground route to Lough Melvin. It demonstrates why that route required scientific investigation. The applicant's evidence of substantial underground water transport elsewhere in the project setting, combined with the cave and swallow hole shown here, makes the absence of comprehensive dye tracing and groundwater-pathway investigation a fundamental omission. The conclusions of no significant effect and no adverse effect on site integrity cannot be relied upon.

1. Faulty Study Area From the Beginning

The first and fundamental defect is the way the study area was defined. The mapped wind-farm boundary repeatedly follows the edge of Coillte forestry and other participating landholdings, forming irregular and zigzag exclusions of adjoining land. In several locations, those exclusions include parts of the Dough and Thur Mountains Natural Heritage Area and its upland blanket bog. The applicant has not provided an adequate environmental justification for excluding those areas or demonstrated that they were physically examined as part of the same functioning mountain, peatland, hydrological and ecological system.

The defect existed from the outset because the development boundary appears to have been allowed to perform two different functions. It identifies land available for construction, but it is also treated in important parts of the EIAR and NIS as though environmental effects terminate at that line. Ownership can define where works are proposed; it cannot define the extent of peat movement, drainage, karst groundwater, protected habitats, bird and bat movement, noise, shadow flicker, landscape effects or telecommunications interference.

Figure 1 — Study Area Boundary and Turbine Locations



Unexplained Internal Exclusions Within the Study Area

Figure 1 does not merely show land beyond the outer study-area boundary. It also shows numerous red-outlined parcels, pockets and irregularly shaped areas located within or surrounded by the wider mapped study area but apparently excluded from it. No clear parcel-by-parcel explanation has been provided for these internal exclusions.

The applicant has not identified what each excluded area represents, whether it reflects separate ownership, unavailable land, refused access, an omitted environmental survey area or some other constraint. Nor has it demonstrated whether these parcels were physically inspected or assessed for peat depth and stability, drainage, groundwater and karst pathways, habitats, protected species, archaeological features or other environmental receptors.

These exclusions are material because environmental systems do not recognise cadastral or ownership boundaries. Peat, surface water, groundwater, sediment, pollution and mobile species may pass into, out of or beneath the excluded areas. A peat failure, drainage pathway, spring, swallow hole, habitat or protected-species feature within one of these parcels could directly affect adjoining turbine infrastructure and downstream receptors.

The absence of recorded environmental features within an excluded parcel cannot be treated as evidence that no such features exist where the applicant has not demonstrated that the land was properly inspected and surveyed. If access was unavailable or refused, that limitation should have been expressly identified and its effect on the reliability of the EIAR and NIS assessed.

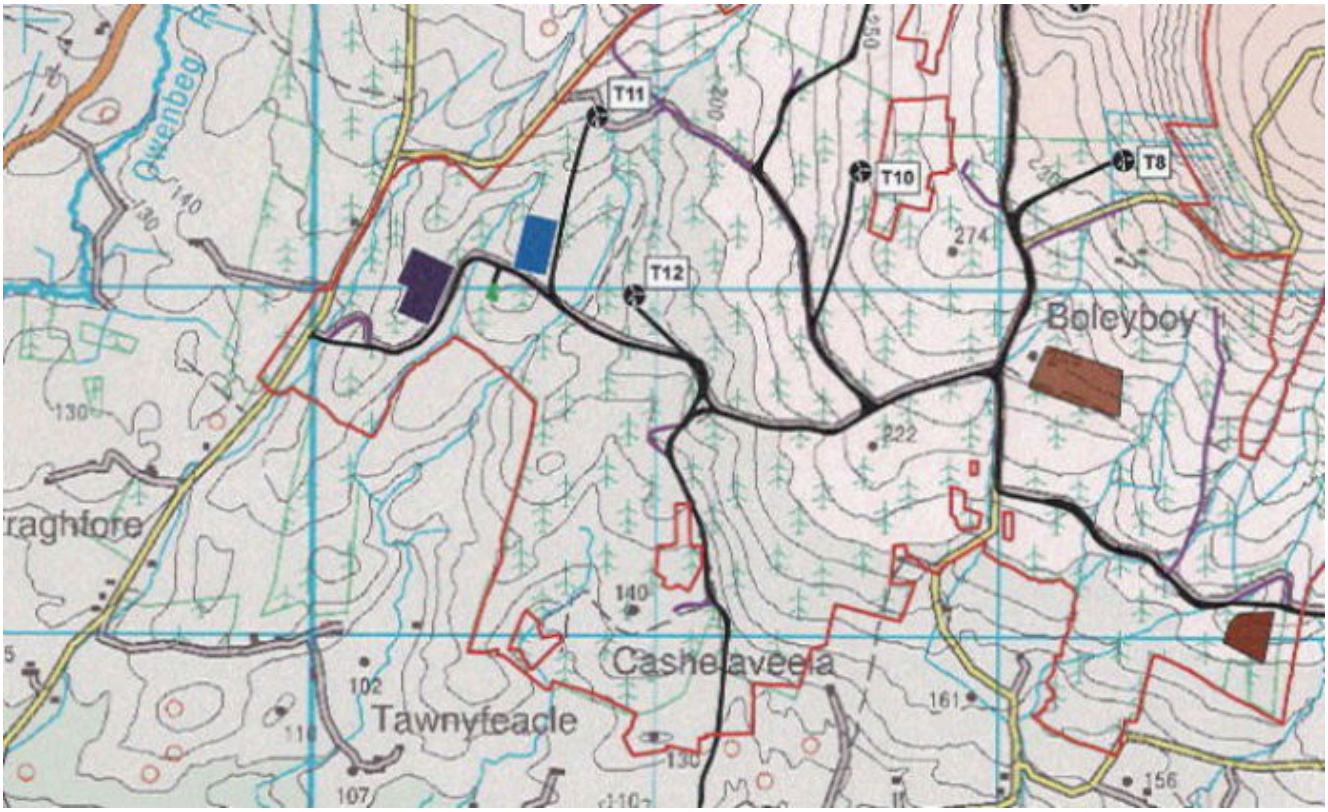
The applicant should be required to provide a schedule and map identifying every internal exclusion, its ownership or access status, the reason for its exclusion, the surveys undertaken within it and the scientific basis upon which significant effects involving that land were excluded.

Without this information, the study area remains incomplete, ownership-led and environmentally unexplained. The Commission cannot be satisfied that the EIAR and NIS describe or assess the complete receiving environment.

Study Area Map Evidence The following enlarged map extracts demonstrate that the red boundary does not form a simple outer perimeter. It repeatedly encloses or bypasses irregular parcels and narrow pockets beside proposed turbines, access roads, borrow-pit areas and upland ground. These mapped omissions require a parcel-by-parcel explanation because the environmental zone of influence cannot be assumed to stop at a planning or ownership line.

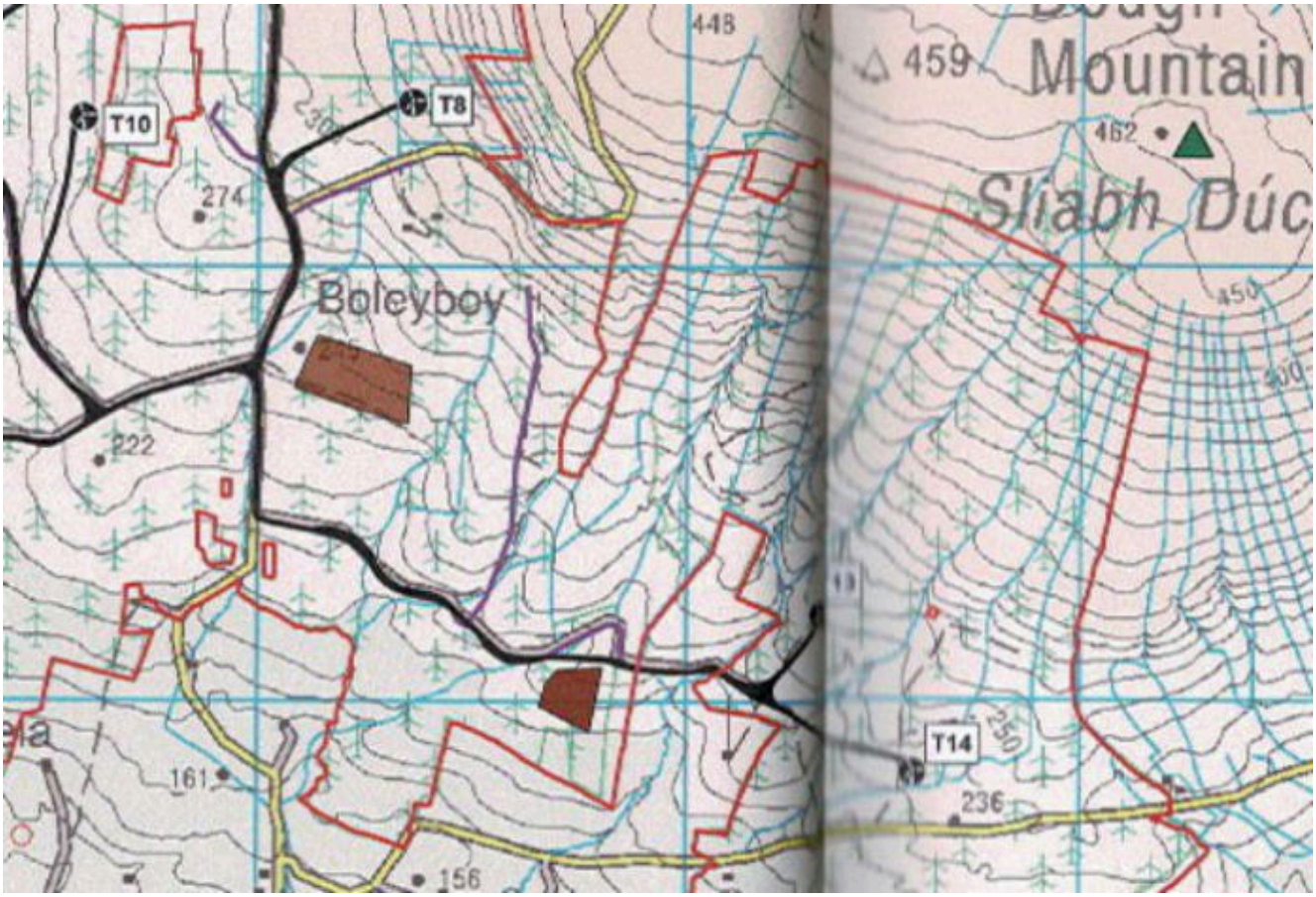
The extracts should be read with the legend and full drawings submitted by the applicant. My observation concerns the repeated mapped pattern and the absence of a clear explanation of the status, survey coverage and environmental significance of each excluded parcel.

Map Plate A Red study-area boundary and internal exclusions near turbines T8, T10, T11 and T12



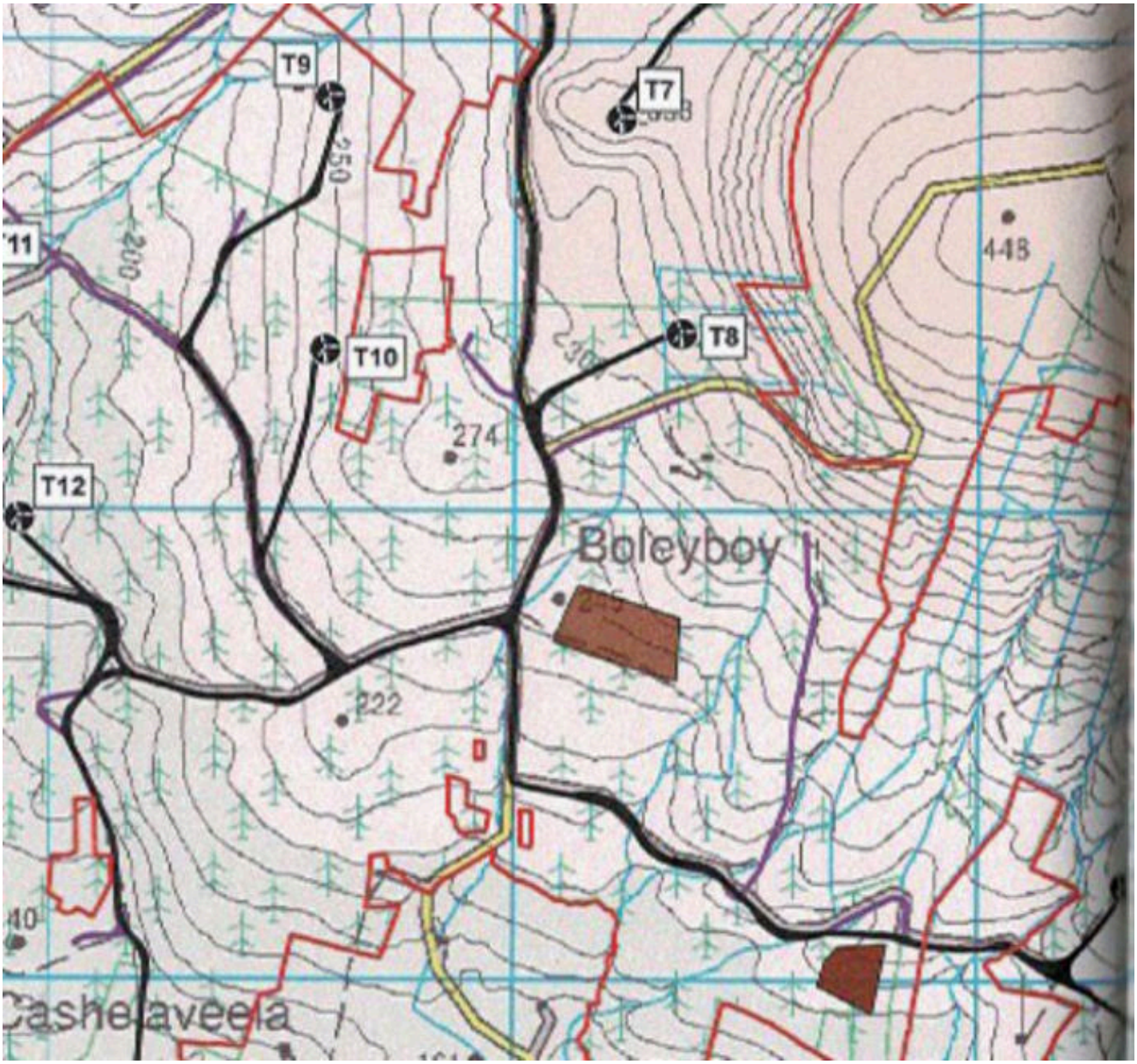
The red line forms numerous indentations and isolated pockets beside turbine and access-road infrastructure. The applicant should identify each parcel and state whether it was surveyed.

Map Plate B Apparent excluded parcels beside the borrow-pit area and access route



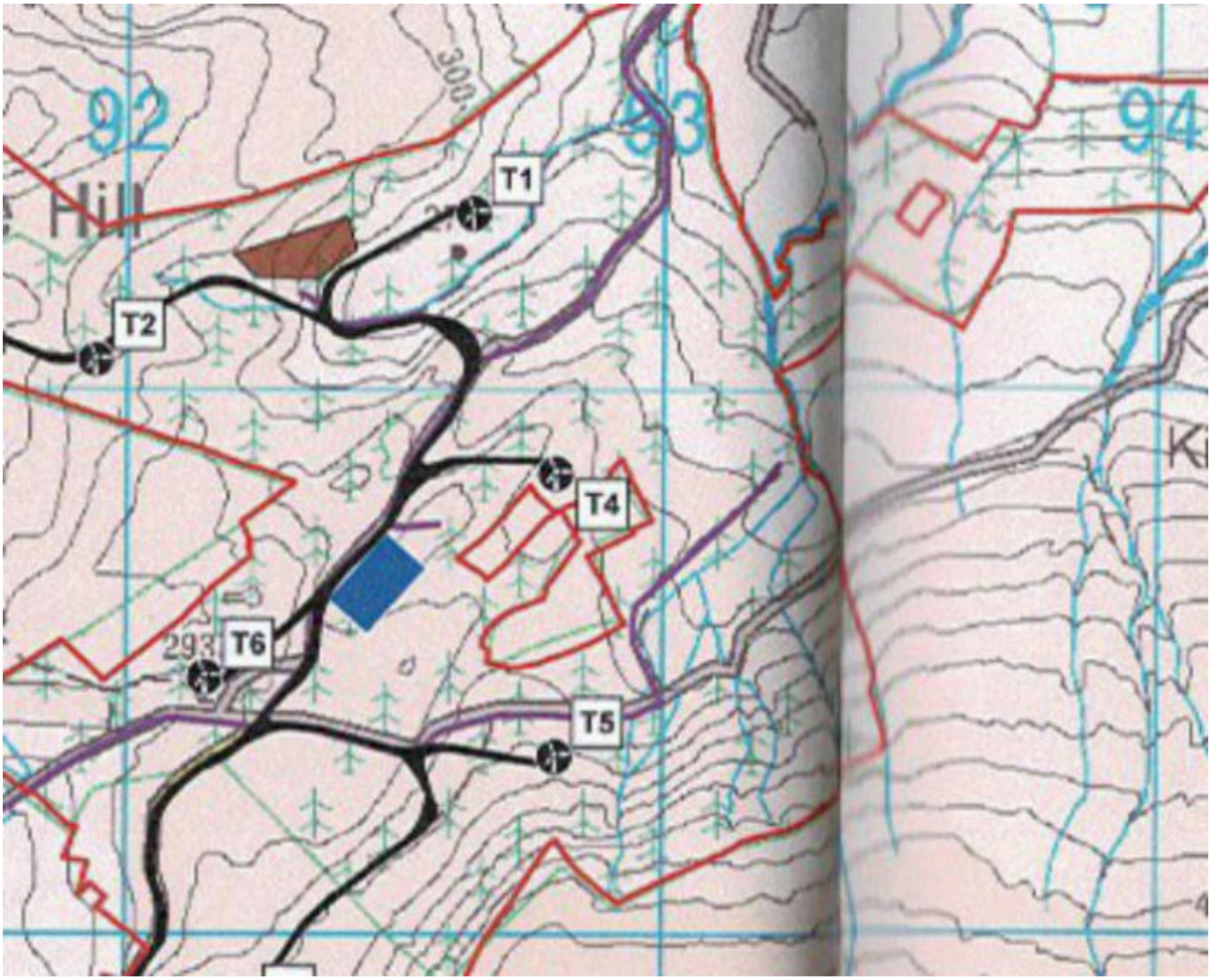
The irregular red boundary lies immediately beside a major construction feature and the turbine access network. This proximity makes the basis and environmental consequences of the exclusions material to the assessment.

Map Plate C Isolated red-outlined parcels within the wider mapped area



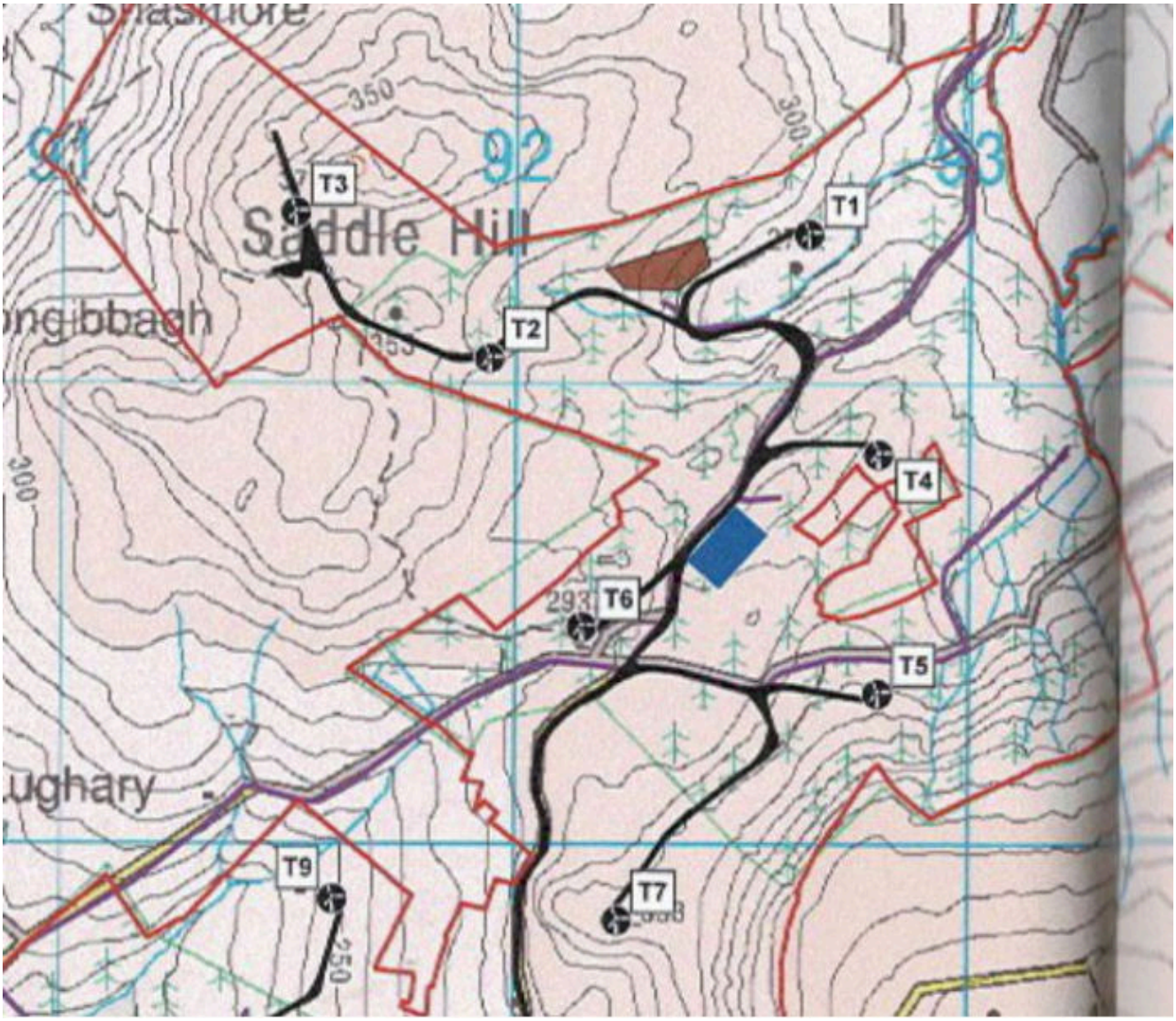
Small isolated boxes and irregular parcels occur among the proposed turbine and road layout. Their purpose, access status and survey coverage are not apparent from the map itself.

Map Plate D Boundary pattern beside upland bog and Natural Heritage Area ground



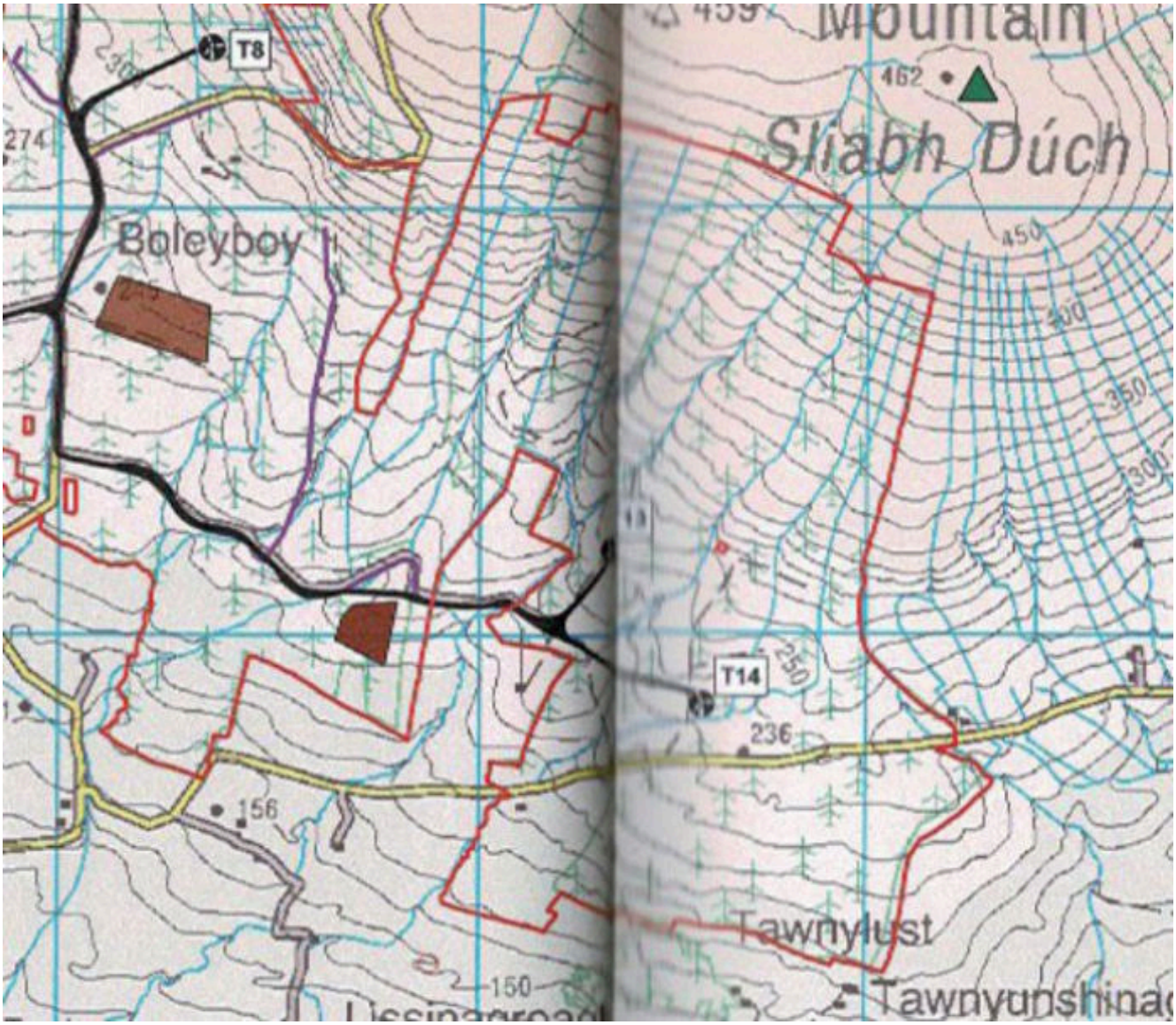
The mapped boundary pattern is particularly important where it adjoins upland blanket-bog and designated or sensitive ground. Hydrological and ecological effects may extend across the red line.

Map Plate E Apparent exclusions around Saddle Hill and nearby turbine infrastructure



The red line closely follows irregular ground beside proposed turbines and access roads. A landholding or construction boundary is not, without scientific justification, an environmental study boundary.

Map Plate F Apparent excluded area on Dough Mountain near the final turbine and road layout



The extract illustrates how the red boundary narrows and changes direction around upland ground while proposed infrastructure remains nearby. Peat, drainage and groundwater pathways must be assessed beyond that line where effects may occur.

Photographic Evidence Associated With Map Plate F The following photographs were taken on the summit of Dough Mountain, on ground adjacent to the area shown in Map Plate F. They show surface drainage, saturated bog vegetation and wet channels on the upland summit. These physical conditions are directly relevant to the concern that the red boundary excludes nearby upland ground while proposed turbine and road infrastructure remains close to it.



Photograph F1 Surface drainage channel and saturated bog vegetation on the summit of Dough Mountain



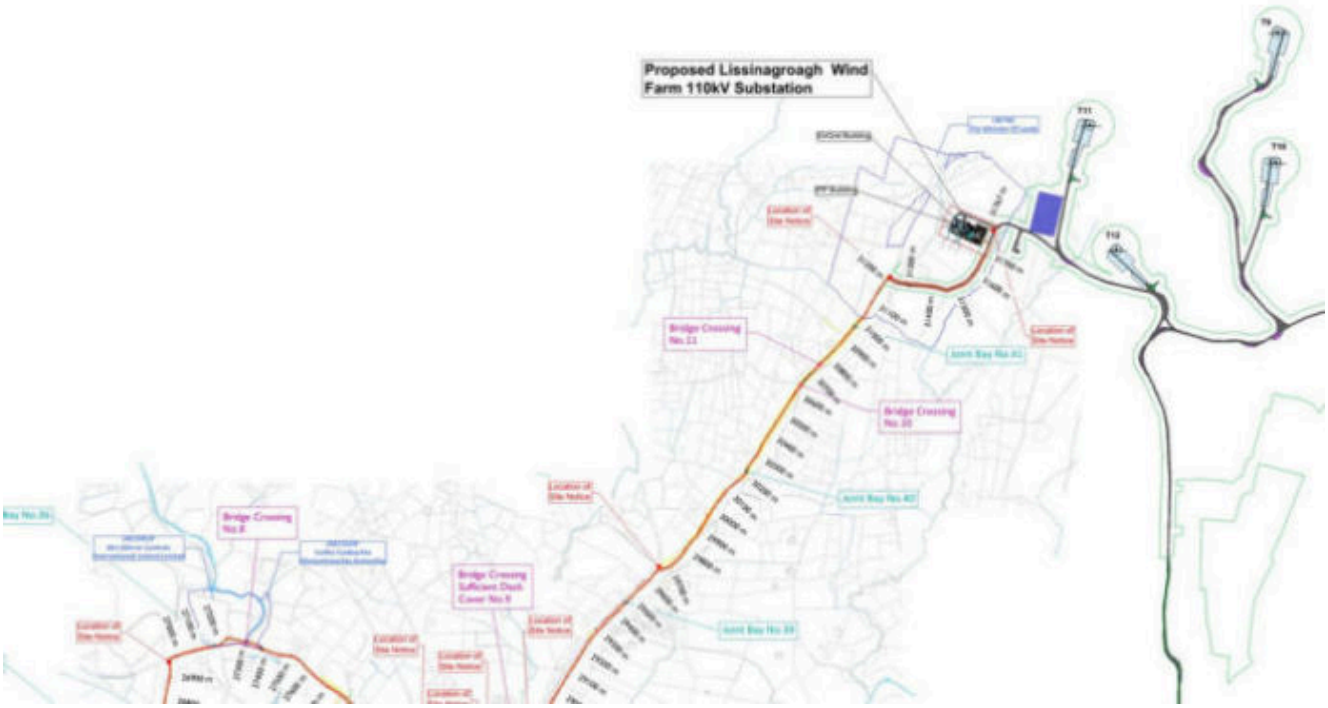
Photograph F2 Wet sphagnum-rich depression and drainage pathway on the summit of Dough Mountain

The photographs demonstrate that the excluded or adjoining summit ground is not environmentally neutral space. It contains active wetland and surface-water features capable of conveying water, sediment or pollution beyond a planning boundary. The applicant should therefore explain the exclusion and demonstrate that the summit drainage and peat system were surveyed and assessed as one connected environmental unit.

Grid Route Study Area Comparison The enlarged extract below shows the final section of the approximately 32 km underground grid route approaching the proposed Lissinagroagh 110 kV substation. The red-line planning boundary is a narrow corridor closely following the cable alignment. This illustrates the same fundamental weakness: the mapped assessment area appears tied to the immediate development footprint, even though surface-water, groundwater, sediment, pollution, ecological and emergency-monitoring effects may extend beyond it.

Map Plate G Enlarged grid-route corridor approaching the proposed Lissinagroagh 110 kV

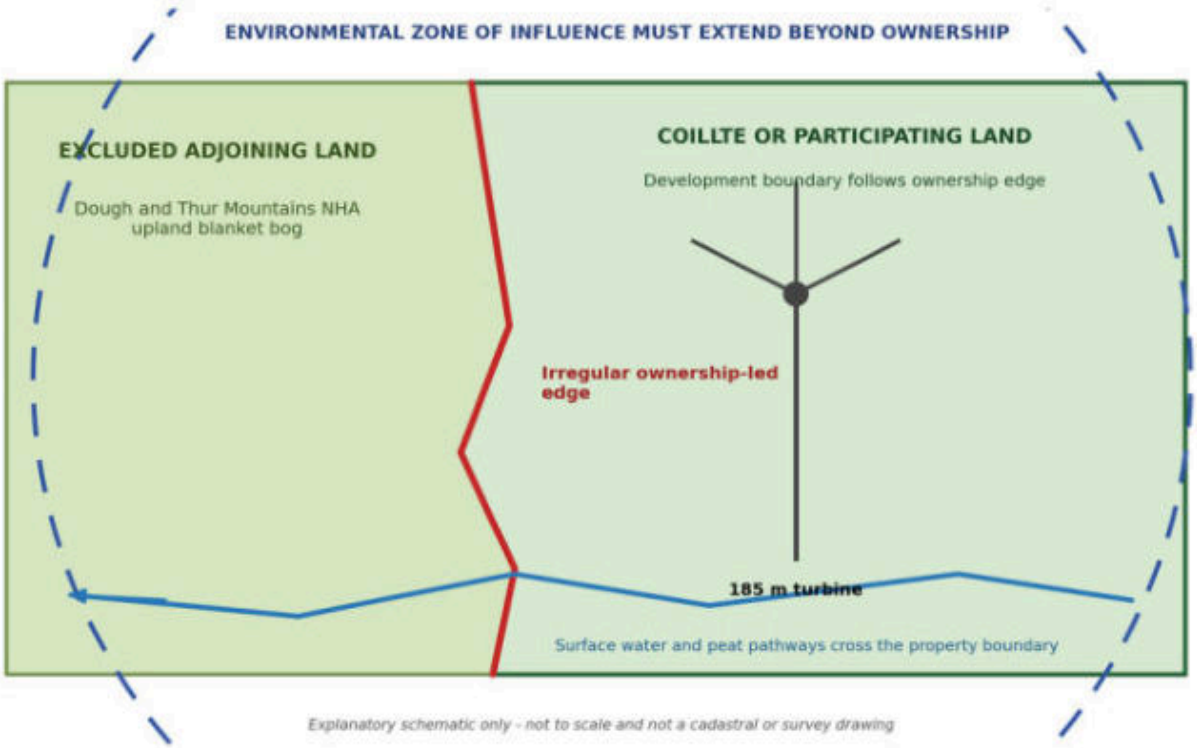
substation



Source: Applicant drawing 05773-U-DR-099-P02, Site Location Map, Sheet 04 of 04. Enlarged extract; chainages, bridge crossings, joint bays and proposed substation are retained for context.

Taken together, Map Plates A to G show why the assessment cannot be confined to the red lines alone. The applicant should disclose the basis of every exclusion, confirm the extent of access and field survey, and assess the complete hydrological, hydrogeological, ecological and peat-related zone of influence before any conclusion on significant effects is accepted.

Figure 2 Why an ownership boundary cannot define the environmental study area


ENVIRONMENTAL ZONE OF INFLUENCE MUST EXTEND BEYOND OWNERSHIP
EXCLUDED ADJOINING LAND
Dough and Thur Mountains NHA upland blanket bog
COILLTE OR PARTICIPATING LAND
Development boundary follows ownership edge
Irregular ownership-led edge
185 m turbine
Surface water and peat pathways cross the property boundary
Explanatory schematic only - not to scale and not a cadastral or survey drawing

1.1 How the Study Area Was Artificially Restricted

Observed feature	Why it undermines the assessment
Boundary follows Coillte or participating property	Raises the concern that land control, rather than the reach of environmental effects, determined the assessed area.
Irregular and zigzag exclusions	No site-specific scientific reason is given for excluding adjoining pockets of private land.
NHA upland blanket bog excluded	A nationally designated habitat forming part of the same peatland and mountain system is placed outside the apparent assessment boundary.
Connected peat slopes and drainage	Peat movement, sediment, runoff and pollution can travel in either direction across the property line and into downstream waters.
Mobile protected species	Hen Harrier, other birds and bats use functional habitat across forestry, open bog and private land; their movements do not follow ownership boundaries.
No transparent physical-inspection map	The public cannot distinguish land walked by specialists from land assessed only through desktop material or not assessed at all.
No access-request record	It is unknown whether adjoining owners were approached, access was refused, or access was never sought.
No justification for excluded areas	An absence of records from unsurveyed land may be mistaken for an absence of receptors or environmental effects.

1.1.1 Polldough Proves That the Environmental System Extends Beyond the Boundary
Polldough is a prime example of the failure inherent in restricting environmental assessment to project or property boundaries. The karst feature is located on land associated with the proposed turbine development. A qualitative dye trace demonstrated an underground connection from Polldough to Mt Dough Stream approximately one kilometre away.

This is direct site-specific evidence that water entering the ground within the proposed wind-farm lands can travel beneath land outside the immediate turbine footprint and reappear at a distant surface-water receptor. The groundwater pathway does not follow the Coillte boundary, the red-line planning boundary or the limits of an individual turbine study area.

Accordingly, the applicant cannot justify excluding adjoining private land, NHA blanket bog or downstream areas merely because no turbine foundation is proposed within those lands. Excavation, dewatering, concrete works, sediment, hydrocarbons or altered drainage at a turbine location may enter karst conduits and affect receptors substantially beyond the construction footprint.

Polldough also demonstrates why the absence of a mapped karst feature on excluded or unsurveyed land cannot establish that no pathway exists. The applicant's own investigations identified karst features that were absent from existing databases. All turbine locations, borrow pits, roads, the substation, mast foundations and cable works in comparable geological conditions required an assessment extending across the complete groundwater catchment and potential discharge locations.

The proven approximately one-kilometre Polldough connection makes the ownership-led and narrowly drawn study boundaries particularly difficult to justify. It is evidence from within the development area that the actual environmental system is wider than the land controlled by the applicant.

1.1.2 Restricted Study Area at the Substation

The map relied upon for the substation area appears to confine the mapped boundary largely to Coillte forestry and to a road immediately behind the proposed substation. It does not visibly extend into adjoining private land beyond the tree line. The boundary therefore appears to follow land ownership or access rather than the environmental systems that may be affected.

This is a serious deficiency because the substation is not an isolated point feature. It is the location at which all internal collector cables converge and where substantial excavation, concrete works, drainage, transformer equipment and nearby permanent mast foundations are concentrated. A surface- water channel beside the substation flows towards the Owenmore River. Effects arising in this small construction area can therefore extend beyond the forestry edge, the road and the application boundary.

Observed limitation	Why it matters
Study boundary follows the forestry edge	Land ownership or access may have determined the mapped area rather than hydrology, geology, ecology, landscape or nearby receptors.
Adjoining private land is excluded	Drains, springs, wells, habitats, ground conditions and residential receptors may be absent from the baseline simply because the land was outside the mapped or inspected area.
A road forms the boundary behind the substation	A road is not a hydrological, geological or ecological barrier and cannot contain runoff, groundwater movement, species movement, noise or visual effects.

Observed limitation	Why it matters
Surface-water channel beside the substation	Runoff, sediment, concrete wash-water or hydrocarbons could enter a channel flowing towards the Owenmore River.
All internal collector cables converge here	Multiple trenches, ducting and drainage works concentrate disturbance and possible preferential flow paths at one location.

Observed limitation	Why it matters
Major excavation and concrete works	The relevant zone of influence extends beyond the immediate footprint of the substation buildings.
Permanent 100 m and 23 m mast infrastructure nearby	Foundations and associated works require cumulative consideration with the substation, including ground, drainage, ecological and landscape effects.
No transparent record of access and physical survey	The public cannot determine whether adjoining owners were approached, whether access was refused, or whether excluded land was physically inspected.

This objection does not assume that this single map represents every topic-specific study area used in the EIAR or NIS. It requires the applicant to identify precisely what the mapped boundary represents; explain its selection methodology; disclose whether it coincides with Coillte or participating ownership; state what adjoining land was physically inspected; provide the access requests and responses; and identify the receptors and pathways examined beyond the tree line.

The absence of a recorded receptor from an excluded or uninspected area is not evidence that no receptor exists. Forestry edges, roads and property boundaries do not stop water, pollution, unstable ground, protected species, noise or visual effects. The artificially restricted area at this concentrated construction junction undermines the adequacy of the baseline and supports the need to assess the whole connected project within an environmentally justified zone of influence.

Access Restrictions Undermine Monitoring and Emergency Response The restricted study area also creates a practical problem concerning access to adjoining and downstream land. Coillte and the applicant do not have an automatic right to enter privately owned land outside the project boundary. Unless the applicant has secured the landowner’s permission or some other lawful right of access, it cannot assume that its personnel will be able to enter that land to undertake sampling, inspect pollution pathways, install monitoring equipment or carry out emergency remedial works.

This limitation is particularly serious at the substation. All internal collector cables converge beside the substation, where substantial excavation, concrete works,

drainage infrastructure, transformers and mast foundations will be concentrated. A surface-water channel beside this construction area flows towards the Owenmore River. Pollutants escaping from the site could therefore pass quickly beyond the applicant’s land and onto private property.

Once pollution has crossed the property boundary, the applicant will be unable to follow it, take samples at the necessary locations or intervene immediately without the relevant landowner’s consent. Monitoring confined to land controlled by the applicant could establish conditions only within that restricted area; it could not reliably demonstrate what happens farther downstream.

The same problem extends along the approximately 32 km Grid Connection Route. Although the cable would generally be installed within public roads, its environmental effects would not necessarily remain within the road corridor. Sediment, drilling fluid, hydrocarbons, concrete-contaminated water or groundwater pollution could travel through drains, streams, rivers, field drainage systems, karst conduits and adjoining private land.

The application identifies no secured, enforceable access arrangement for excluded or downstream private lands where monitoring, sampling, containment or emergency intervention is required. The Commission must assess the project on the access rights and monitoring network actually demonstrated in the application. It cannot assume that landowners will later grant permission, that easements will be obtained, or that access can be secured during a pollution or peat-stability emergency. Measures dependent upon unconfirmed third-party access are uncertain and cannot support the applicant's conclusions that monitoring and mitigation will be effective. This evidential gap must be resolved before any consent is considered and should not be deferred to a post-consent condition.

The requested ten-year period for commencing and constructing the Wind Farm compounds this deficiency. An informal permission or access understanding that may exist at the application date cannot be assumed to remain available throughout that period. Land may be sold, ownership or occupation may change, and a voluntary permission may expire, be withdrawn or prove too limited for monitoring, sampling, containment and emergency works. The applicant must therefore demonstrate legally secured and sufficiently durable access arrangements covering the entire period in which construction is ongoing, together with the monitoring and emergency-response requirements arising from the development. The Commission cannot rely on future negotiations with third-party landowners to cure a present deficiency in the application.

Before permission could be considered, the applicant should therefore identify:

every off-site monitoring and sampling location;

the hydrological reason for selecting each location;

whether the land is publicly or privately owned;

the lawful basis upon which access will be obtained;

the frequency and duration of monitoring;

arrangements for access outside normal working hours; the procedure for entering downstream land during an emergency; the personnel authorised to contain or recover pollutants; and contingency measures if a landowner refuses or withdraws access.

Access and downstream protection

Daily monitoring is practicable only where personnel have lawful and safe access. The application does not demonstrate a complete network of secured downstream sampling and intervention locations, or a documentary record of the access requested and granted. The consequences differ by location:

Location or issue	Assessment deficiency and consequence
Land outside Coillte ownership	There is no automatic right of entry to adjoining private land. Without secured access, relevant land cannot be inspected, sampled or monitored, and the proposed measures cannot be implemented along the full water pathway.
Substation watercourse	The channel beside the concentrated excavation, concrete, transformer and mast works provides a pathway towards the Owenmore River. Sediment, concrete wash-water and hydrocarbons can leave the controlled site.
Grid-route drainage	The corridor intersects or passes close to drains, bridges, watercourses, groundwater pathways and private fields. Effects extend beyond the road corridor and application boundary.
Karst groundwater	Underground pathways do not follow property boundaries. Pollution can emerge at a distant spring, cave, river or private property, requiring off-site investigation.
Emergency intervention	Without immediate access, pollution can pass beyond the monitored area before its nature, concentration and extent are established. Delayed sampling, containment or recovery allows downstream damage to increase.

These are consent-stage deficiencies. The applicant has not demonstrated that its monitoring and emergency measures are deliverable throughout the receiving environment. A condition requiring access and monitoring to be arranged later does not establish their present feasibility. The ten-year access-duration issue is addressed immediately above.

Daily monitoring: evidence missing from the application

One inspection each day does not provide continuous protection. Sediment, concrete-contaminated water, hydrocarbons or drilling fluid can enter a channel after an inspection and travel beyond accessible land before the next visit. The application needed the following operational and access evidence:

Requirement	Evidence needed and present deficiency
Mapped monitoring network	Every inspection and sampling location, its hydrological purpose, ownership or land control, and coverage along the full receiving watercourse. No complete downstream network has been demonstrated.
Enforceable access	Written permissions, easements or other lawful arrangements covering the required locations and intervening properties. No complete record establishes continuous access to trace pollution or undertake emergency works.
Refused or withdrawn access	Alternative sampling locations and an emergency-access procedure. An adequate contingency has not been identified.
Out-of-hours and emergency access	Safe, immediate access during flooding and outside normal working hours. Ordinary permission does not establish unrestricted emergency access.
Defined daily programme	Timing, frequency, duration, competent personnel, parameters, reporting thresholds and responsibility for intervention. A general daily-inspection promise is not an enforceable programme.
Protection between inspections	Continuous instruments, automatic alarms or event-triggered monitoring at high-risk points. A rapid pollution event can begin and travel downstream between daily visits.
Severe-weather monitoring	A programme intensified before, during and after heavy rainfall, when rapid transport and difficult or unsafe access coincide.
Containment and response	An effective off-site intervention plan, authorised personnel and practical arrangements for containing or recovering pollutants. These measures have not been demonstrated for the complete water pathway.

The Commission cannot rely on construction-stage monitoring as a substitute for the missing baseline, access rights or practicable response arrangements. These matters must be established before permission.

Additional monitoring and stability failures at the turbine sites

The turbine-site concern extends beyond downstream sampling. Adjoining upland blanket bog, including parts of the Dough and Thur Mountains NHA, lies outside the applicant's ownership and mapped study boundary. The condition, peat depth, drainage and stability of this connected ground have not been adequately investigated.

This bog forms part of the same elevated peatland, slope, groundwater and surface-water systems as the turbine sites. A failure can begin outside the boundary, within it, or cross between the two. Monitoring confined to controlled land will not reliably detect its initiation or full extent.

Tree felling, drainage alteration, access-road construction, turbine excavations, crane hardstands, borrow pits, cable trenches and concrete works affect the wider peatland system. Monitoring only foundations and roads omits adjoining slopes, undisturbed bog, pre-existing drains, forestry channels, peat fissures and receiving waters. Baseline instruments and observations are needed before construction to identify later changes.

A daily visual inspection cannot establish continuous stability. Peat cracking, groundwater-pressure changes, drain blockage and rapid runoff can develop between visits. By the time movement or contamination is visible within the site, it can already have reached inaccessible private land. Heavy rainfall also makes isolated upland ground and fast-flowing channels dangerous to approach.

The ridge above Dough is dangerous to approach during a ground-movement or pollution incident and would put investigators at risk. A response dependent on unsafe access cannot be relied upon. Safe monitoring, off-site access and emergency intervention have not been demonstrated before consent.

These requirements apply at every turbine and hardstand, internal road and cable trench, borrow pit, permanent mast, the 110 kV substation, the external Grid Connection Route and the downstream receiving catchments. The missing baseline and access arrangements undermine the claimed safeguards and support refusal.

Photographic Evidence from Dough Mountain

The EIAR and NIS make no reference to the ground conditions

on the summit of Dough Mountain.

These photographs show conditions on the summit and steep gradient of the Dough and Thur

Mountains NHA, adjacent to proposed turbine T13 and the main borrow pit.





Steep blanket-bog slope above the forestry.

Blanket-bog vegetation on the Dough Mountain summit.





Forestry below the eroded upland bog.

Surface drainage channel across the upland blanket bog.

1.2 The Grid Route Study Area Has the Same Fundamental Defect

The same problem arises along the approximately 32 km Grid Connection Route. The cable trench or road corridor identifies where construction is proposed; it does not define the complete receiving environment. Route-specific study areas must extend far enough on both sides to identify connected watercourses and groundwater pathways, bridges and culverts, riparian habitat, hedgerows, trees and buildings used by bats, protected species, archaeological features, private wells, houses, access constraints and cumulative effects. A narrow corridor cannot establish that effects outside it are absent.

This concern is heightened by the admission in the Archaeology Chapter that numerous turbine- delivery-route accommodation locations were screened out because they were within an existing road corridor or public footway, and that indirect visual effects were not assessed because the works were considered short-term and limited in scale. Comparable assumptions along the Grid Connection Route must be tested against the actual receptors at each bridge, HDD crossing, off-road section, joint bay and environmentally sensitive location.

1.2.1 Inconsistent Treatment of Lough Gill SAC and NHA Blanket Bog The approximately 920 m was not merely selected as a general study distance: the proposed GCR physically passes through Lough Gill SAC for that length. The NIS identifies this section and Figure 9 identifies six watercourse crossings within it, together with eight additional crossings outside the SAC that drain into it. The objection therefore does not allege that the SAC section is wholly absent from the NIS. It asks whether the complete 920 m and its connected lands were consistently delineated across the planning drawings, EIAR and NIS and included in every relevant field survey and technical study area.

That recognition exposes the need for an explanation of the different treatment elsewhere. If the applicant accepted that works and connected watercourses required detailed assessment across the SAC section, it must explain the objective basis for restricting other parts of the route to narrower corridors and for excluding adjoining areas of the Dough and Thur Mountains NHA upland blanket bog. The designations are legally different: an SAC engages Appropriate Assessment, while an NHA does not have the same European-site procedure. That difference does not remove the NHA from Environmental Impact Assessment where indirect or cumulative effects can reach it.

The NHA is not environmentally separated from the project by the Coillte boundary. It forms part of the same mountain, peat body, drainage system and functional habitat. Peat movement, altered drainage, sediment, pollution, construction disturbance, forestry effects and bird movements cross the ownership line. The applicant must demonstrate a scientific reason for every material exclusion; ownership or absence of proposed infrastructure inside the NHA is not such a reason.

Comparison	Question the applicant must answer
920 m of GCR inside Lough Gill SAC	Identified because the works physically enter the European site; the same extent must be carried consistently through all

Comparison	Question the applicant must answer
	relevant route surveys and assessments.
Route-side areas outside narrow corridors	The applicant must justify why connected land, watercourses, habitats, wells and houses were outside any topic-specific study area.
Adjoining NHA blanket bog	Absence of works inside the designation does not eliminate indirect effects through peat, drainage, disturbance and ecological connectivity.
Different SAC and NHA legal regimes	Explains the need for Appropriate Assessment of the SAC, but does not justify omitting likely NHA effects from the EIAR.
Ownership-led boundary	The applicant must show that Coillte ownership did not determine the environmental survey boundary.
Missing physical-survey and access record	It remains unclear whether adjoining owners were approached, access was refused, or access was never sought.

Elevated Blanket Bog and Downstream Risk

Parts of the Dough and Thur Mountains NHA comprise elevated upland blanket bog on slopes above and adjoining the forestry, turbine area and connected headwater catchments. In practical terms, this peat occupies ground from which any instability would move downslope. The environmental relevance of the NHA therefore does not depend on whether a turbine foundation is placed inside its legal boundary. Its peat condition, slope, drainage and relationship with the proposed works are part of the receiving environment.

For the documented Derrybrien comparison, see Section 9.1.

A comparable outcome cannot be assumed at Lissinagroagh. The relevance of Derrybrien is addressed in Section 9.1. Investigation of the NHA and complete connected peat body must establish the effects of forestry-altered and fissured peat, excavation, construction loading, roads, ponded or released water and natural drainage. The project boundary cannot be assumed to provide protection.

Potential event - likely pathway - possible consequence

Failure within elevated NHA or adjoining peat

Peat will move downslope under gravity and follow existing hollows, drains, seepage lines and headwater channels.

Loss and fragmentation of blanket bog; exposure of mineral ground; damage to forestry, private land, roads and nearby property.

Mobilised peat reaches a stream

The material will become fluid, travel beyond the original failure scar and carry sediment through connected river channels.

Severe turbidity, burial of riverbed habitat, smothering of spawning gravels, oxygen depletion and harm to fish and aquatic invertebrates.

Pollution travels beyond the project boundary

Northern drainage can enter the Sraduffy River, pass through Kiltyclogher to the County River, join the Lattone River and reach Lough Melvin. Southern drainage can enter the Owenmore River and Lough Gill. Western karst drainage may connect with the Dooard River and Lough Melvin.

Effects could extend to SAC features, drinking-water sources, fisheries, cross-border waters and communities many kilometres from the initiating works.

The EIAR and NIS cannot provide the necessary certainty merely because the NHA is outside the construction or ownership boundary. The potential result is therefore not

confined to damage within the NHA. A peat failure would remove or fracture protected blanket bog, descend through forestry or private land, damage roads and structures, and enter fast-flowing headwater channels.

Connected receiving waters

On the northern and north-western side of Dough Mountain, mobilised peat or sediment would enter the Sraduffy River, pass through Kiltyclogher to the County River, continue to its confluence with the Lattone River and ultimately reach Lough Melvin SAC. Dean’s Lake, at the source of the County River, forms part of this sensitive local water environment. Where material enters western karst drainage, a pathway towards the Dooard River and Lough Melvin must also be examined. On the southern and south-western side, runoff and mobilised sediment could enter the Owenmore River system and travel towards Lough Gill SAC and its drinking-water abstraction.

The actual receiving route depends on the precise point of failure, surface topography and any underground karst connection; that is why those pathways must be mapped and tested.

T13 and T14: watercourses and the Lough MacNean concern

Watercourses below T13 and T14 must also be included in the assessment of slippage and downstream sediment transport. My concern includes material reaching Lough MacNean and onward to Lough Erne in County Fermanagh. TOBIN’s Part 2 response, Section 2.2.1, places T6–T14 within the Owenmore and Bonet subcatchment. The applicant must reconcile the actual channels below T13 and T14 with that mapping and establish their receiving waters. I identify the MacNean–Erne route as a concern requiring investigation, rather than a verified connection from these turbines.

Consequences and missing investigations

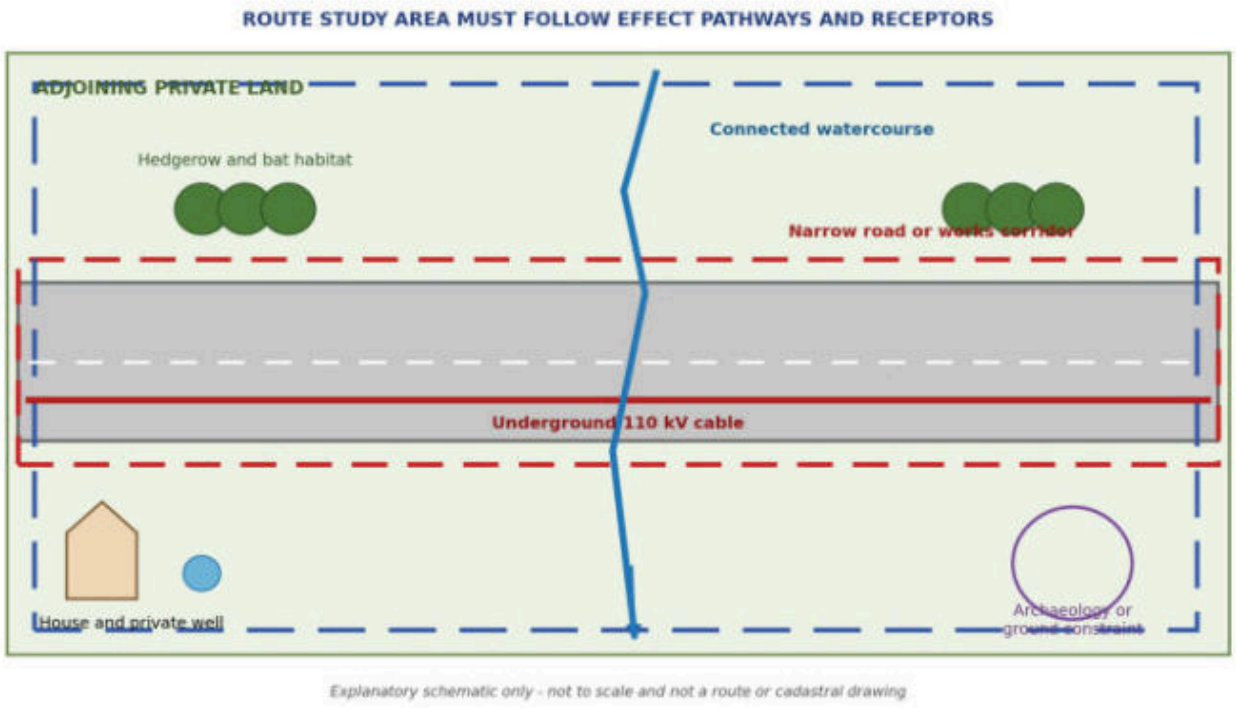
The possible consequences include severe turbidity; burial of riverbed habitat; smothering of spawning gravels; reduced oxygen; mortality of fish and aquatic invertebrates; damage to Lough Melvin SAC and Lough Gill SAC; and interference with the raw-water sources used by communities dependent on Lough Gill and Lough Melvin. See Derrybrien, Section 9.1.

The applicant has not demonstrated that the excluded NHA land was physically inspected or subjected to peat-depth probing, geomorphological mapping, groundwater assessment, forestry-fissure assessment or movement-corridor modelling comparable to the adjoining development lands. Without that evidence, the absence of proposed works inside the NHA cannot establish the absence of risk. The NHA should

have been included within a wider, environmentally defined study area and assessed as part of the same mountain peat and drainage system before permission was sought.

The objection is not that every topic must adopt an identical 900 m buffer. Different effects properly require different study areas. The deficiency is that each boundary must be justified by the geographical reach of the effect rather than by ownership, road width or construction footprint. Unless this is demonstrated, the different treatment of Lough Gill SAC, route-side lands and NHA blanket bog undermines the completeness and reliability of the EIAR and NIS.

Figure 3 Why the grid route study area cannot be confined to the cable or road corridor



	Grid-route issue		Required scope of assessment	
	Cable trench or road width		Defines the works footprint only; it cannot define hydrological, ecological, archaeological or residential effects.	

	Grid-route issue		Required scope of assessment	
	Adjoining private land		May contain wells, drains, habitats, archaeology and ground conditions capable of being affected by the works.	
	Bridges, culverts and HDD crossings		Require location-specific inspection of the structure, banks, riparian habitat, bats, water quality and subsurface conditions.	
	Hedgerows, trees and buildings		May provide bat roosts, commuting routes and ecological connectivity outside the carriageway.	
	Karst and groundwater		Subsurface pathways may extend well beyond the visible road and cannot be confined to an arbitrary linear buffer.	
	No consultation template or access schedule		The public cannot determine which route-side owners were contacted, what they were told or which land was physically examined.	

	Grid-route issue		Required scope of assessment	
Grid-route issue		Required scope of assessment		
Approximately 920 m within Lough Gill SAC		The NIS identifies and maps this section, but the application must		

Grid-route issue	Required scope of assessment
	demonstrate that the same full extent and connected watercourses were consistently included in every relevant field survey and technical study area.

1.3 Physical Examination and Landowner Consultation

For a project of this scale and sensitivity, the applicant should have sought reasonable access to environmentally connected lands, particularly adjoining NHA blanket bog, peat slopes, surface-water channels, karst terrain, bridges, hedgerows and habitats along the wind-farm and grid route. If access was unavailable, the location, limitation and alternative assessment method should have been recorded. Land that was not entered or surveyed cannot simply disappear from the environmental baseline.

The applicant did not consult residents along the approximately 32 km grid route through its public-engagement programme. Engagement focused on the wind farm area and does not demonstrate consultation with the households and communities affected by the grid works. That does not establish which households or landowners were contacted, what distance or townlands were used, what maps were supplied, what access or surveys were requested, or whether the consultation covered the turbines, substation, grid connection, 100 m meteorological mast and later 23 m telecommunications mast as one overall project.

1.4 Evidence the Developer Failed to Provide to the Commission

1. An overlay distinguishing the planning boundary, Coillte ownership, other participating lands, private lands and the complete NHA boundary. 2. Separate scientifically justified study areas for peat stability, hydrology, hydrogeology, ecology, ornithology, bats, landscape, noise, shadow flicker and telecommunications. 3. A map distinguishing land physically inspected from land assessed remotely or not surveyed. 4. The generic circular, access request and maps sent to landowners and households, with personal information redacted. 5. An anonymised schedule showing the parcels and townlands contacted, dates, responses, access granted or refused and surveys completed. 6. A reasoned explanation for every material exclusion and the effect of each survey limitation on the reliability of the EIAR and NIS.

The repeated coincidence between the project boundary and Coillte or participating ownership, together with the exclusion of adjoining NHA blanket bog, demonstrates why the Study Area must be examined before every later conclusion in the EIAR and NIS. Unless the applicant proves that the wider environmental zones of influence were independently defined and adequately examined, the reported absence of effects represents an absence of investigation. That defect was built into the assessment from the beginning and undermines the reliability of all later conclusions dependent upon the restricted baseline.

Priority Grounds for Refusal

The objection is concentrated on matters that cannot be answered merely by saying that risk can be mitigated, that separate applications are permissible, or that further investigation can occur after consent. The material presently before the Commission is not a coherent, route-specific and whole-project evidential basis sufficient to assess the development now.

A. Whole-Project Assessment: Test the Evidence, Not the Number of Applications

This submission does not contend that the existence of separate wind-farm and grid applications is, by itself, unlawful. The applicant has itself stated that the wind farm and Grid Connection are functionally interdependent and constitute a single project for Environmental Impact Assessment. The decisive issue is therefore whether the common EIAR and NIS actually contain a complete baseline and assessment for all environmentally material components of that single project.

The Commission should identify, topic by topic, whether the baseline relied upon for the wind farm genuinely extends to the statutory Grid Connection Route, its off-road sections, HDD locations, bridge and culvert crossings, joint bays, substation, control buildings and permanent telecommunications mast. Where route-specific information appears only in the later Grid application, the Commission should also determine whether members of the public participating in the Wind Farm application had access to the environmental information necessary to understand and comment upon the effects of the complete functioning project.

The relevant public-participation question is not whether a second opportunity to make a separate submission exists. It is whether material environmental information necessary to assess the single EIA project was available when the public was invited to participate in the assessment of the Wind Farm component. Later information may supplement a complete assessment; it cannot retrospectively make earlier public participation informed if it reveals a material baseline, pathway, receptor or infrastructure effect that was not previously available.

B. Demonstrated Karst Connectivity: Polldough Is Evidence, Not Speculation

The Polldough qualitative dye trace is particularly important because it demonstrates an approximately one-kilometre subsurface connection to Mt Dough Stream. The submission does not extrapolate that result to every metre of the Grid Connection Route. Its significance is narrower and stronger: substantial underground connectivity has actually been demonstrated within the environmental setting of the overall project.

That evidence requires the applicant's conceptual hydrogeological model to be tested at comparable geologically sensitive parts of the Grid Connection Route, especially HDD locations, off-road sections, deep excavations, watercourse crossings and locations where karstified or fractured bedrock may provide preferential pathways. The

question is not whether dye tracing is automatically required by law. The investigations actually undertaken do not exclude a material pathway at the particular infrastructure locations being authorised.

Where a later ground investigation, karst protocol or confirmatory survey could identify a void, conduit, unstable ground condition or groundwater pathway requiring relocation or a materially different construction method, that investigation is not merely confirmatory. It concerns the suitability and environmental effects of the location for which permission is presently sought.

C. Lough Gill SAC and River Bonet: Source-Pathway-Receptor Assessment Required

Approximately 920 m of the Grid Connection Route is identified within Lough Gill SAC, in addition to River Bonet and other watercourse crossings. The objection does not rely merely on the existence of a European-site designation. The Commission must examine the actual construction operations at and hydrologically connected to these locations: trenching, HDD entry and exit areas, drilling-fluid management, dewatering, sediment mobilisation, temporary working areas, vegetation removal, accidental releases and reinstatement.

For each relevant location, the assessment should identify the source, pathway, receptor, qualifying interest or conservation objective, mitigation relied upon and residual uncertainty. If the conclusion of no adverse effect depends on assumptions about absence of connectivity, construction method or future surveys that have not been demonstrated at the consent stage, the necessary certainty for Appropriate Assessment has not been established.

D. No Dedicated Grid-Route Bird Surveys: Define the Missing Baseline

The Ornithology Chapter states that no dedicated bird surveys were undertaken for the GCR or TDR accommodation areas. This cannot be answered simply by describing most of the cable as road- corridor development. The route includes off-road works, riparian habitats, watercourse crossings, HDD compounds, private and agricultural land, a section within Lough Gill SAC and permanent above- ground infrastructure at Faughary.

The Commission should therefore require a clear evidential explanation of how likely significant ornithological effects were assessed at those components without a dedicated route-specific survey baseline. The issue is especially material because extensive multi-year ornithological work was considered necessary for the generating station, including Hen Harrier assessment. Reliance on wind- farm survey data is only valid to the extent that the survey area, timing and methodology actually cover the Grid infrastructure and its zone of influence.

E. Permanent 23 m Telecommunications Mast: An Identifiable Assessment Is Required

The permanent telecommunications mast forms part of the Grid development and must be assessed as such. The issue is not that a 23 m mast necessarily creates the same collision or landscape effect as a 185 m turbine. The issue is whether this permanent above-ground structure has received an identifiable ornithological and representative visual assessment at its actual location, including foundations, access, habitat effects, lighting or guying if applicable, and its relationship to recorded bird use.

If the applicant specifically assessed collision implications of the separate wind-farm meteorological mast but no equivalent identifiable assessment can be located for the permanent Grid telecommunications mast, the omission is a component-specific gap in the common EIAR rather than a generalised concern.

F. Ground Investigation: Focus on Locations Where the Result Could Force Redesign

This submission does not suggest that intrusive investigation is required along every metre of an underground cable. The decisive locations are those where the result could change whether or how the approved development can be built: HDD compounds and bores, off-road sections, deep excavations, culvert and bridge approaches, geologically sensitive sections, joint bays and locations where unexpected rock, groundwater, karst or instability could require relocation or a materially different construction method.

The Commission should distinguish legitimate construction verification from deferred investigation of a fundamental constraint. A condition cannot safely substitute for baseline information where the later result could alter the route, land take, crossing technique, drainage design, mitigation or Appropriate Assessment conclusion after the public-participation stage.

For the Derrybrien comparison relevant to pre-consent ground investigation, see Section 9.1.

The Commission should therefore require a location-specific, dynamic assessment of peat depth and condition, forestry fissuring, temporary and moving loads, groundwater and pore-water pressure, drainage alterations, possible failure corridors and downstream receptors. These matters cannot safely be converted into post-consent construction controls where the results could require relocation, redesign or refusal.

G. Material Internal Discrepancy: Stated Length of the Grid Connection Route

The applicant's documents use several different figures for the Grid Connection Route: approximately 32 km for the total connection in Chapter 2, approximately 30.6 km within the public-road corridor, approximately 33.5 km for an earlier preferred route, and 36.5 km in Chapter 9, Noise and Vibration. Some figures may describe different stages or components and the numerical differences are not, by themselves, proof of an assessment failure. The material issue is whether every environmental chapter, survey, crossing schedule, receptor count and mitigation measure assessed the same final lodged route and its full construction footprint.

The Commission should require a clear reconciliation of those figures and establish which route length and alignment were used in each environmental chapter, model, survey and appendix. If different route assumptions were used, the applicant should identify where each difference arises and demonstrate that ecology, hydrology, WFD, noise, traffic, cultural heritage and cumulative assessments all address the same final development for which permission is sought.

H. Road Safety: Test Particular Constraints, Not Merely the Absence of a Route-Wide Audit

The road-safety ground is not advanced on the basis that a formal Road Safety Audit is automatically required for every cable section. The material question is whether known constraints along narrow public roads, bridge approaches, bends, residential frontages, community receptors, construction compounds and working-width restrictions were sufficiently assessed before route selection and consent.

A later Traffic Management Plan can regulate implementation of an already assessed development. It should not be relied upon to discover that the approved construction corridor cannot safely accommodate the works, plant, traffic management or temporary land requirements without material alteration.

The study area should include the entire affected roadway from the point at which it enters the blanket peatland, together with every section requiring widening, passing bays, strengthening, drainage changes or other alterations for the project.

These works affect more than the carriageway. Excavation, loading and altered drainage interact with adjoining peat, slopes, habitats and watercourses. The assessment must therefore extend to the surrounding ground and connected receiving waters affected by those works.

The roadway cannot be assessed solely as a transport corridor. Its physical alteration forms part of the development and must be included in the relevant environmental study areas, with boundaries justified by the effects and pathways involved.

I. EirGrid 220 kV Reinforcement: Supporting Context Only

The proposed Lissinagroagh 110 kV connection and EirGrid's wider 220 kV North-West reinforcement programme perform different functions and should not be conflated. This submission does not rely on regional grid capacity or the existence of the 220 kV programme as an independent reason for refusal. The strategic programme is relevant only where a realistic interaction is demonstrated, including cumulative works, Srananagh node interaction, construction phasing, land requirements or inconsistency in the description of foreseeable connected infrastructure.

J. Public Participation and Later Statutory-Body Material

The Commission's post-lodgement consultation with Leitrim and Sligo County Councils is significant because route-specific views are being sought on matters including European sites and NHAs, flooding and surface-water drainage, landscape and visual impact, road carrying capacity and safety, and environmental carrying capacity. Any substantive response received should be tested against the information that was available during the Wind Farm public-participation period.

If a later Council, NPWS/DAU, IFI, EirGrid, ESB Networks, Uisce Éireann or Northern Ireland authority response introduces material new environmental information, the Commission should ensure that it is promptly placed on the public file and that the public has an effective opportunity to address it before a decision is made. The relevant issue is informed participation in the assessment of the whole project, not criticism of a body merely because its statutory response had not yet been made at an earlier date.

Priority Decision Test

The Commission should ask six questions before permission is considered: (1) Is the same final Grid route used throughout every relevant environmental chapter and appendix? (2) Is there a route-specific baseline for the environmentally sensitive components of that route? (3) Are demonstrated karst and groundwater pathways adequately reflected in the conceptual model? (4) Are effects on Lough Gill SAC and connected waters excluded on evidence rather than assumptions deferred to construction stage? (5) Have the permanent telecommunications mast and off-road Grid works received identifiable ornithological and visual assessment? (6) Could any deferred investigation force material redesign, relocation or a different mitigation/AA conclusion? If the answer to any of these questions depends upon information still to be discovered after consent, the application has not demonstrated the acceptability of the development now.

1. Description of the Proposed Development

The Section 182A development comprises a permanent 110 kV on-site electrical substation at Faughary, Co. Leitrim, and an approximately 32 km underground 110 kV Grid Connection Route to the existing ESB Networks Srananagh 220 kV Substation in Co. Sligo. Approximately 30.6 km is stated to be within the public-road corridor, but the route also includes forestry and agricultural/private lands.

Permanent 110 kV substation with EirGrid control building and IPP control building. Electrical plant, grid ancillary equipment and associated infrastructure. Telecommunications mast up to 23 m in height, with 2.3 m below ground level. Parking, lighting, security fencing, wastewater holding tanks and rainwater harvesting. Approximately 32 km underground 110 kV cable. 11 bridge crossings: eight in-road HDD, two off-road HDD and one bridge-deck crossing. Eight culvert crossings by open trenching.

Permanent national-grid infrastructure which is not simply removed with wind-farm decommissioning.

Evidence: Applicant’s 21 August 2026 cover letter and SID application form.

2. One EIAR and One NIS — One Overall Environmental Project

“The Proposed Development ... and the proposed development ... subject of the Lissinagroagh Wind Farm application are functionally interdependent and constitute a single project for the purposes of Environmental Impact Assessment.”

This is central. The statutory planning applications remain separate, but the applicant itself has defined the wind farm and grid as one environmental project. The EIAR/NIS must therefore assess the direct, indirect, cumulative and interacting effects of the turbines, internal collector cabling, substation and statutory 32 km GCR as an integrated whole.

The internal electrical collector cabling connecting turbines to the on-site substation must be distinguished from the statutory 32 km GCR. They fall within different planning applications. Nevertheless, both cable systems form part of the overall Proposed Project. An environmental mechanism relevant to underground cable excavation — groundwater interception, altered drainage, peat disturbance, fractured rock, karst or preferential flow — cannot logically be confined to one cable system merely because of the application in which it sits.

2.1 The Substation and Watercourse Demonstrate the Environmental Indivisibility of the Project

The proposed wind farm and Grid Connection Route have been submitted through separate planning procedures. However, the evidence demonstrates that they are not functionally or environmentally independent developments.

All electricity generated by the fourteen turbines will travel through the internal collector cables to the proposed 110 kV substation. Those cables converge at the substation beside a surface-water channel flowing towards the Owenmore River. The external Grid Connection Route begins at the same substation and carries the electricity onwards to Srananagh. The substation is therefore the physical and functional junction between the two applications.

This relationship is especially important because substantial excavation, concrete works, drainage infrastructure, transformer equipment, converging cable trenches and nearby mast foundations are concentrated at this junction. The surface-water channel provides an identifiable environmental pathway from this combined construction area to the Owenmore River.

Connected component	Relationship to the overall project	Consequence for assessment
Fourteen turbines, up to 185 m	Generate the electricity	The wind farm cannot operate as proposed without the internal cables, substation and external grid connection.
Internal collector cables	Carry electricity from every turbine	The cables converge at the substation beside the surface-water channel.
110 kV substation	Collects and transforms the electricity	It is the physical and functional junction between the wind-farm and grid applications.
Concrete and excavation works	Construct the substation, buildings, foundations and associated infrastructure	These works create pollution risks beside a channel flowing towards the Owenmore River.
Surface-water channel	Connects the substation area hydrologically with the Owenmore River	Environmental effects cannot be confined to either application boundary or a narrowly defined study area.
Permanent 23 m telecommunications mast	Proposed to address interference with the Net1 link attributed to T13	It is a remedial consequence of the turbines disclosed through the later grid application.

Connected component	Relationship to the overall project	Consequence for assessment
Permanent 100 m meteorological mast	Forms part of the wind-farm infrastructure near the substation area	Its foundations, landscape effects and ecological interactions require cumulative assessment with the substation and 23 m mast.
External 110 kV Grid Connection Route	Carries the wind farm’s electricity from the substation to Srananagh	It has no identified independent purpose without the proposed wind farm.

Connected component	Relationship to the overall project	Consequence for assessment
EIAR and NIS	Describe wind-farm and grid infrastructure as parts of the overall Proposed Project	Direct, indirect, cumulative and interacting effects must be assessed together and consistently.

The existence of this common junction and shared hydrological pathway supports the conclusion that the developments constitute a single integrated project for environmental-assessment purposes. The administrative separation of the applications cannot divide the physical movement of electricity, water, sediment or pollution.

The later disclosure of the permanent 23 m telecommunications mast further demonstrates the problem. The mast is stated to be required because turbine T13 would interfere with the Net1 transmission link. It is therefore a mitigation response to an effect caused by the wind farm, yet it appears as infrastructure within the later grid application. Members of the public commenting on the wind-farm application were consequently not provided with the complete telecommunications consequences or remedial infrastructure associated with the turbines.

The objection is not that separate applications are automatically unlawful. It is that the applicant’s approach has divided information about one integrated project between separate processes and has impaired the public’s ability to understand and comment upon the development as a whole.

Whether advanced through one planning application or separate statutory procedures, the wind farm, internal collector cables, substation, permanent masts and external Grid Connection Route must be assessed as one functionally and environmentally connected project. The substation and adjoining watercourse demonstrate why separate application boundaries cannot be treated as environmental boundaries.

Accordingly, the Commission should not determine the Grid Connection application in isolation. The personnel examining it should communicate formally with those examining the wind-farm application and ensure that the following matters are considered in both cases:

the newly disclosed interference between T13 and the Net1 transmission link; the purpose, location and environmental effects of the remedial 23 m mast; the combined effects of the 23 m and 100 m permanent masts; the concentration of cable trenches, excavation and concrete works at the substation; the surface-water channel flowing from the substation area towards the Owenmore River; the adequacy of the shared EIAR and NIS; the effects of the later information on public participation in the wind-farm application; and whether the complete project has been assessed before either element is authorised.

Requested conclusion

The separate application procedures have resulted in material information about the environmental and telecommunications consequences of the turbines becoming apparent only through the later Grid Connection application. That information directly affects the assessment of the wind farm and should have been available to the public when observations were invited on that application.

The Commission cannot remedy this deficiency merely by imposing construction conditions or treating the grid infrastructure as an ancillary development. It must assess the complete project using all information now available and ensure meaningful public participation in relation to the newly disclosed material.

If the Commission cannot establish that the whole connected project has been completely and consistently assessed, and that the public has been afforded an effective opportunity to comment on its material components and effects, permission should be refused.

2A. The Entire Electrical Development Must Be Assessed

The whole-project principle is set out on page 62. This section applies it to the complete electricity-generating and export system, including the internal cables, substation, permanent masts and external Grid Connection Route. The applicant's reliance on one EIAR and one NIS requires these connected components and their interacting effects to be assessed together.

The environmental assessment must therefore follow the complete electricity-generating and export system:

14 turbines → internal underground collector cables → Faughary 110 kV substation and permanent 23 m telecommunications mast → approximately 32 km underground 110 kV Grid Connection Route → Srananagh Substation.

The internal collector cables and the statutory 32 km GCR are legally distinct components in separate planning applications, but they are parts of the same integrated electrical project for EIA/NIS purposes. The environmental mechanism associated with underground excavation — including groundwater interception, altered drainage, peat disturbance, fractured rock and karst — must therefore be assessed consistently wherever comparable conditions occur. The degree of risk may vary with local geology, but the environmental question does not disappear when the cable changes classification at the substation.

This is especially important because the applicant's own hydrogeological assessment records an actual underground groundwater pathway at Polldough extending approximately one kilometre to Mt Dough Stream. The submission does not assert, without mapping evidence, that a particular T7/T8 collector cable crosses that exact pathway. The decisive point is that the overall project contains underground electrical excavation in an area where significant subsurface connectivity has actually been demonstrated.

2A.1 The 23 m telecommunications mast is part of the grid development

The permanent 23 m telecommunications mast forms part of the Faughary 110 kV substation development. It is a separate structure from the wind farm's 100 m meteorological mast. It is therefore not sufficient that the mast appears in the development description. As a permanent component of the integrated project, its relevant environmental effects had to form part of the EIA process before consent.

The ornithological assessment is incomplete because it does not contain an identifiable assessment of the permanent 23 m telecommunications mast. The applicant specifically assessed collision risk associated with the separate 100 m meteorological mast, yet the permanent telecommunications mast forming part of the Grid Connection development was omitted from an equivalent assessment. This is an existing deficiency in the environmental assessment of the development for which permission is sought and is a ground for refusal.

2A.2 Bird surveys and the Grid Connection

The Ornithology Chapter expressly states that no bird surveys were undertaken for the GCR or TDR accommodation areas. That omission is material because the GCR is not a homogeneous strip of road pavement. It includes private and agricultural land, watercourse crossings, off-road HDD works, riparian habitats and a section within Lough Gill SAC. The overall project also includes permanent above-ground grid infrastructure at Faughary.

The absence of dedicated GCR bird surveys, combined with omission of an equivalent ornithological assessment of the permanent 23 m mast, means that the bird assessment does not comprehensively assess all environmentally material components of the integrated project. That deficiency exists at the consent stage and supports refusal; it should not be converted into a request for later surveys or post-permission assessment.

2A.3 Photomontages and visual assessment

The public has therefore not been provided with equivalent representative visual material by which the permanent substation and telecommunications mast can be judged in the landscape. This is not a matter to be corrected after permission. It is a deficiency in the application and common environmental assessment presently before the Commission and supports refusal.

2A.4 Material information in the Grid application must be considered before the Wind Farm is determined

The telecommunications information disclosed through the Grid Connection application has a direct and material bearing on whether consent should be granted for the proposed Wind Farm. The potential interference arises from the proposed turbines, particularly the relationship between T13 and the Adelphi Net1 Dough Mountain to O'Donnell's Rock radio link. The proposed 23 m telecommunications mast is intended to address an effect of the Wind Farm; it is not merely an unrelated effect of the underground Grid Connection.

The Wind Farm and Grid Connection applications are being processed under separate case references. That administrative separation must not prevent material information held on one file from being considered in the other. Since the Wind Farm application remains undetermined, the Commission is requested to establish formal communication between the staff processing the Grid Connection application and those processing the Wind Farm application, and to place the relevant telecommunications reports, drawings and correspondence before the Wind Farm case team.

Before determining the Wind Farm application, the Commission should establish when the T13 and Net1 issue was identified; why the mitigation remained unresolved in the Wind Farm EIAR; when a specific 23 m relay mast was selected; what evidence demonstrates that it will work; what alternative works would be required if it failed; and whether the later information materially supplements the Wind Farm project description, EIAR, NIS, mitigation commitments or public notice.

If that information materially supplements or changes the environmental assessment or proposed mitigation, it should be made publicly available on the Wind Farm case, with any further public notification and opportunity for observations required by law.

The Commission should not consent to the Wind Farm on the assumption that this turbine-generated interference can be resolved after consent through a structure whose final design and effects were not before the public when observations were invited.

The Commission is expressly requested to ensure that its internal allocation of separate case teams does not result in the Wind Farm being decided without consideration of relevant information already held by the same competent authority in the connected Grid Connection proceedings.

Photomontage evidence 1 - Omitted summit view towards Manorhamilton and Benbo

These photographs support my objection that the photomontages omit the view from Dough Mountain’s summit. The visual assessment must show the turbines, roads, hardstands, borrow pits and forestry clearance from this elevated position. Lower viewpoints do not represent the summit perspective.



This photograph records the elevated view across the forestry and surrounding landscape towards Manorhamilton and Benbo. It demonstrates the across-and-down perspective that lower-level viewpoints cannot substitute for.

Photograph by Joseph Sheerin. Viewpoint and direction identified by the observer. These are existing views, not photomontages of the proposed development.

Photomontage evidence 2 - Omitted summit view towards Lough Melvin



This photograph records the relationship between the upland peatland, forestry and Lough Melvin. The labels form part of the observer's original photograph; precise application and designation boundaries must be read from the accompanying maps.

Photograph by Joseph Sheerin. Viewpoint and direction identified by the observer. These are existing views, not photomontages of the proposed development.

2A.5 Permanent 100 m meteorological mast and 23 m telecommunications mast

The overall development contains two separate permanent elevated structures: the Wind Farm's 100 m meteorological monitoring mast and the Grid Connection development's 23 m telecommunications mast. The purpose of the 100 m mast is to measure wind conditions at the Wind Farm site, normally including wind speed, wind direction, temperature and potentially turbulence at different heights. Those measurements may be used to monitor turbine performance, compare actual conditions with the predicted wind resource and support operation and maintenance. It is not the mast proposed to relay the Adelphi Net1 signal. Both masts are additional to the fourteen turbines and the Faughary 110 kV substation, and their effects cannot be understood merely by listing their heights in separate project descriptions.

No clear receptor schedule has been identified stating the distance from either mast to the nearest occupied house, nearest group of houses, public road, recognised viewpoint or sensitive landscape receptor. The absence of those measurements prevents the public and the Commission from comparing the local visual and residential effects of the two masts with those of the turbines and substation.

A 100 m mast is a substantial permanent vertical structure. Depending on its siting, elevation, design, lighting, background and distance from a dwelling or road, its immediate local effect could be more prominent than that of a more distant turbine. This is not a conclusion that the mast necessarily has the greater effect; it is the reason why exact receptor distances, verified photomontages and a site-specific assessment were required.

State-body and prescribed-body material referring to the landscape sensitivity and potential effects associated with the T2 and T3 area reinforces the need to assess every permanent elevated structure in the same landscape. The two masts are closer than some turbines to roads and local housing. Their different height does not justify their omission from an equivalent receptor-based and cumulative assessment.

The applicant states that consultation was undertaken with local households concerning the turbines. The Commission should require the applicant to demonstrate whether those same households were clearly informed that the overall development would also contain a permanent 100 m meteorological mast and a permanent 23 m telecommunications mast; whether their locations and dimensions were shown; whether the reason for the 23 m mast was disclosed; and whether residents were invited to comment on their individual and combined effects.

Required information	Why it matters	Apparent deficiency
Distance from each mast to occupied houses and roads	Determines residential and close-range visual exposure	No receptor-distance schedule identified
Representative views showing both masts and the substation	Allows their individual and combined landscape effects to be judged	No equivalent photomontages identified
Household consultation record	Shows whether residents knew about both permanent masts	Turbine consultation does not by itself establish disclosure of the masts
Final Net1 design and performance evidence	Establishes whether the 23 m mast will remedy the T13 interference	Solution and contingency remained unresolved in the Wind Farm EIAR
Combined assessment with T2, T3 and other elevated infrastructure	Avoids fragmented assessment of one landscape	Components are treated across separate applications and technical chapters

2A.6 Consequence for the current application and the common EIAR/NIS

Applying the whole-project principle set out on page 62, the applicant cannot rely upon a single overall-project EIAR and NIS while allowing material components of that same integrated project to receive materially different or incomplete investigation and assessment.

The omissions concerning the internal electrical system, route-wide underground-grid investigation, GCR bird surveys, permanent 23 m telecommunications mast and representative photomontages are not requests for clarification or invitations to provide additional information. They are deficiencies in the environmental assessment submitted with the applications. Because the applicant expressly relies on the same EIAR and NIS for the Wind Farm and Grid Connection as one functionally interdependent project, those deficiencies cannot logically be confined to ACP-323353-25 alone. They call into question the adequacy of the environmental assessment of the overall Lissinagroagh project and support refusal of the Grid Connection application.

The more recent High Court decision in North Westmeath Turbine Action Group v An Bord Pleanála further confirms the importance of the integrated-project principle to the EIA process, including public notification and participation. The legal point relied upon here is that the EIA process must extend to the whole integrated wind-farm/grid project; it is not enough for the grid to exist only as background information while public-facing assessment concentrates on selected components.

2A.7 Fragmentation of the Hen Harrier Assessment - 23 m Telecommunications Mast

The permanent 23 m telecommunications mast illustrates fragmentation within the applicant's own "single project" assessment. The applicant proposes habitat enhancement intended to influence Hen Harrier use of the wider Dough Mountain/Saddle Hill landscape, yet the mast has not received an equivalent identifiable ornithological assessment.

The submission does not assert that the mast will necessarily attract Hen Harriers. The material issue is that a new elevated structure could provide a perch or influence hunting and flight behaviour in a landscape already identified for nesting and foraging, while fourteen 185 m turbines and other permanent infrastructure are also proposed.

The relevant interaction is therefore: existing nesting and foraging use; proposed habitat enhancement; future movement; turbines and internal infrastructure; the 100 m meteorological mast; the substation; and the 23 m telecommunications mast. Birds do not recognise the administrative boundary between the two applications.

This is an existing consent-stage omission, not a matter for later surveys or post-consent monitoring. It supports refusal for the reasons already stated in Sections 2A.1, 2A.2 and 2A.6.

3. Public Participation and the Timing of the Two Applications

The wind-farm application was lodged on 14 May 2026. The grid application entered its statutory public inspection period only from 28 August 2026. Yet substantial grid material was still being developed or finalised after the wind-farm application had been lodged, including the Grid Planning Statement, closure of pre-application consultation, drawing-scale arrangements, landowner consent material, statutory-undertaker material, transboundary notification and prescribed-body notification.

The public considering the wind farm did not have the final lodged 32 km SID application before it. This is material because the applicant now relies on one EIAR and one NIS for the entire interdependent project. Effective participation requires the public to be able to understand the actual project and its likely significant effects while options remain open, not merely discover material components or unresolved constraints later.

The applicant cannot rely upon a single overall-project EIAR and NIS when seeking permission, but then use the existence of two separate planning applications to prevent scrutiny of deficiencies that affect the environmental assessment of that same overall project.

3.1 Applicant-Defined Boundaries Cannot Restrict Public Scrutiny

The developer does not determine the legal limits of public scrutiny simply by deciding how to divide the project, its study areas or its documentation. The scope of public objection cannot be narrower than the scope of the environmental project which the

applicant itself asks the Commission to approve.

This is illustrated by the overhanging upland bog and visible peat movement raised in local evidence. If a specific risk was not clearly identified in the material put before a prescribed body, silence in that body's response cannot reasonably be treated as assessment or acceptance of that risk. Silence on an environmental risk which was not properly presented for consideration is not an environmental assessment of that risk.

The same principle applies to groundwater, karst, cable excavation, bird movement, visual effects and other processes that cross applicant-defined boundaries. The Commission must assess the real environmental relationships rather than the administrative compartments used to present them.

3.2 Limited Public Engagement on the 32 km Grid Connection

The approximately 32 km Grid Connection crosses numerous townlands, roads, watercourses, communities and sensitive environmental receptors. The public engagement described by the submitter included a by-appointment meeting in Rossinver rather than a dedicated series of open route-wide consultations for the communities and roadside residents affected by the final route.

This matters because the applicant treats the Wind Farm and Grid Connection as one functionally interdependent project for EIA, while the final Grid Connection application entered public inspection only after the Wind Farm application had been lodged. The public considering the Wind Farm did not have the final lodged SID application before it.

EirGrid's staged Powering Up the North West process is relevant as a comparator, not because FuturEnergy was required to reproduce it exactly, but because it illustrates the value of engaging communities while route corridors, technology and constraints remain open.

3.3 The Applicant's Two-Kilometre Consultation Claim Does Not Address the Grid Route

Public submissions on the Wind Farm application identified an absence of meaningful consultation. The applicant's response relies on engagement with households within approximately two kilometres of the Wind Farm study area and on Wind-Farm-focused brochures, exhibitions and community clinics. That does not demonstrate comparable early consultation with the separate population living, farming, owning land or operating businesses along the approximately 32 km Grid Connection Route. The route extends far beyond the Wind Farm consultation area and introduces different locations, receptors and forms of impact.

On the documentation reviewed, the Grid application was publicised through the statutory newspaper and site-notice process and became available for inspection only after the Wind Farm application had already been lodged and its public-participation period had substantially progressed. No equivalent route-selection process, open series

of route-community meetings or household consultation along the final route has been identified. A by-appointment meeting in Rossinver is not equivalent to accessible engagement with all of the communities, roadside residents, farms and businesses affected across Leitrim and Sligo.

This is an apparent consultation imbalance rather than an assertion that the statutory notice procedure is automatically invalid. Its planning significance is that people most directly affected by the cable route had no comparable opportunity to influence route selection, crossing methods, working areas, traffic arrangements, access protection, drainage, reinstatement or the siting of joint bays and compounds before those matters were presented as the proposed development.

3.4 Seven Weeks Is Not a Substitute for Early Route Consultation

The public along the Grid Connection Route was, in practical terms, given approximately seven weeks in which to discover, obtain, read and understand the complete Grid application and its relationship with the Wind Farm, EIAR and NIS, and then prepare a technically informed submission. The applicant itself says that the Wind Farm and Grid Connection are functionally interdependent and constitute one project for EIA. Yet the public considering the Wind Farm did not have the final lodged Grid application, while the public along the Grid Route encountered the complete integrated project only at the formal submission stage.

The burden was particularly substantial because the material includes a long linear route, numerous townlands, bridges, culverts, HDD locations, off-road sections, joint bays, protected waters, karst and groundwater issues, traffic impacts and extensive technical appendices. A statutory inspection period may provide a formal opportunity to make a submission, but it does not retrospectively provide the early engagement that could have informed the choice and design of the route.

The effects on route-side households and landholders are not confined to temporary inconvenience. They may include repeated road excavation, restricted or managed access, construction traffic, noise, vibration, dust, temporary working areas, drainage interference, utility conflicts, reinstatement and emergency-access constraints. Farmers may face effects on field access, livestock movement, drainage, soil structure, biosecurity and the timing of agricultural operations. Businesses may face interrupted access, deliveries, customer movement and trading disruption. Permanent cable infrastructure, joint bays, wayleaves or access requirements may also become relevant to future planning applications, services, entrances or development proposals on affected or adjoining land. The submission does not claim that every property will suffer every effect; it submits that these route- specific interests required early, intelligible and location-specific engagement and assessment.

A ten-year permission period would intensify this concern. Residents, farmers, landowners and businesses could remain uncertain for many years about the timing and detailed implementation of works affecting roads, accesses, land use and future investment. During that period ownership, businesses, agricultural practices, planning proposals, environmental conditions and community needs may change, while the affected public would not receive a new consent-stage opportunity to comment merely

because construction is delayed. The longer development horizon therefore increases the importance of adequate consultation, a complete present baseline and a sufficiently fixed and assessed design before permission is granted.

Process consequence: the Commission should examine whether the consultation record and short period of first exposure to the final route allowed effective public participation in the environmental assessment of the whole project. The absence of comparable route-wide engagement also increases the significance of unresolved land, access, road-safety, drainage, environmental and detailed-design matters. These matters should not be deferred to private agreements, contractor plans or post-consent liaison after the public's effective opportunity to influence the development has passed.

The Commission's separate pre-application case file, VC12.323353 / ACP-323353-25, records a second meeting on 30 March 2026. Its meeting record states that further in-depth discussions would be held at the next meeting. No third meeting record appears in the published case file before the process was closed on 17 June 2026 at the prospective applicant's request. That sequence is not, by itself, evidence of procedural wrongdoing or a reason for refusal. It is relevant context because route and environmental details continued to develop, and the lodged application must itself fully answer matters that may otherwise have been expected to receive further pre-application discussion.

Process consequence: the Commission should ensure that the final route, crossing schedule, survey coverage, design development and environmental assessment resolve the matters left under development at the end of the published pre-application record. Closure of that process cannot substitute for complete information in the application now before it.

4. Leitrim County Council — Awareness Is Not Assessment

The consultation record shows that Leitrim County Council was aware of the developing grid proposal. By 11 March 2026 the Council was being presented with a separate Section 182A grid application, a 110 kV substation, an approximately 32 km mostly public-road route, 11 bridge crossings and two off- road River Bonet crossings. The presentation also stated that all project components were assessed in the project EIAR.

However, awareness of the Grid Connection is not the same as assessment of the Grid Connection. Earlier formal scoping material did not clearly demonstrate a detailed route-specific Council assessment of the final extended GCR. A presentation supplied to the Council is not equivalent to a fresh substantive Council response evaluating the final development ultimately lodged.

If substantive Council comments on the final GCR were relied upon in preparing the common EIAR/NIS, those comments should be clearly identifiable and available for public scrutiny. If no such route-specific response was made, earlier wind-farm scoping comments should not be treated as though they constitute Council assessment of the final Section 182A development.

The applicant’s published grid application material contains notification and application documents, but no fresh substantive post-lodgement Leitrim County Council assessment has been identified in the material supplied for this review. The absence of such a response must not be interpreted as acceptance or endorsement.

Evidence: Leitrim County Council presentation 11 March 2026; applicant’s August 2026 grid application pack.

5. EirGrid — Formal Notification but No Substantive Response Identified

The application pack contains a specific notification letter to EirGrid dated 21 August 2026. It identifies the Section 182A GCR and permanent 110 kV substation. No substantive EirGrid response to that August SID notification has been identified in the applicant’s published application documentation supplied for this review.

This is important because EirGrid is the State transmission system operator, the proposed substation includes an EirGrid control building, and the proposed cable terminates at Srananagh while EirGrid is itself progressing major strategic reinforcement involving the same node.

A notification letter is not evidence that EirGrid has endorsed, accepted or technically assessed the final development. If EirGrid submits material information concerning network capacity, reinforcement dependencies, technology, Srananagh works or interaction with its strategic programme, that information should be made available promptly so that the public has an effective opportunity to consider it before determination.

A separate information request was sent to EirGrid on 29 June 2026 and, according to the submitter, no reply had been received. This is included as the submitter’s correspondence history and should not be treated as proof of EirGrid’s substantive position on the planning application.

6. EirGrid’s Strategic North-West Programme

EirGrid’s Powering Up the North West programme identifies the need for two new 220 kV circuits in the Roscommon, Sligo, Leitrim and Donegal area: Srananagh–Clogher and Flagford–Srananagh. Srananagh–Clogher is a new 220 kV circuit between the Srananagh and Clogher substations. Flagford –Srananagh involves partial replacement of the existing 110 kV Flagford–Sligo circuit with a new 220 kV circuit and connection into Srananagh with new 220 kV and 110 kV circuits.

Evidence: EirGrid, Powering Up the North West, September 2025.

EirGrid’s work is now at Step 4 of its six-step development process, where route corridors and project details are being progressed. This is not a minor background matter. The project-specific Lissinagroagh 110 kV connection is being advanced while the strategic transmission configuration affecting the same North-West network and Srananagh node remains under active development.

6.1 Technology studies

For Srananagh–Clogher, EirGrid considered a complete 220 kV underground solution but found that it would create serious challenges for grid operation, reliability and security of supply. A hybrid option was also considered and found undeliverable. EirGrid identified a 220 kV overhead line as the Emerging Best Performing Technology Option for that strategic project.

For Flagford–Srananagh, EirGrid also considered an underground 220 kV option and stated that it would add significant risk to regional grid reliability. Its emerging option partly replaces the existing 110 kV line and reuses the existing alignment.

These findings do not prove that a 110 kV underground connection for Lissinagroagh is technically invalid; 110 kV and 220 kV projects are not equivalent. They do demonstrate that underground versus overhead technology, reliability, capacity and network configuration are substantive engineering questions, not matters that can be assumed merely because a cable route has been drawn.

Evidence: EirGrid Powering Up the North West: technology options for Srananagh–Clogher and Flagford–Srananagh.

7. Strategic Capacity and Risk of Duplicative Infrastructure

The applicant’s project-specific 110 kV connection does not replace EirGrid’s identified 220 kV strategic reinforcement. Even if the cable can carry the wind farm’s output to Srananagh, that does not itself demonstrate sufficient downstream network capacity to receive and export that generation securely.

The public may therefore face both the environmental cost of approximately 32 km of project-specific underground infrastructure and later strategic 220 kV reinforcement. Potential cumulative effects include repeated road works, additional works at Srananagh, land requirements, ecological effects, community disruption and, depending on the final EirGrid design, overhead infrastructure.

The Commission should require clear evidence of available network headroom, connection dependencies and the relationship between this project and EirGrid’s Step 4 programme. The planning drawing of a cable route is not evidence of firm export capacity.

8. Fundamental Karst and Hydrogeological Deficiency

The applicant’s own evidence establishes that the project area contains complex karst hydrogeology. The Hydrology and Hydrogeology Chapter records a high degree of interaction between groundwater and surface water in karstified limestone and recognises that contamination can move rapidly between the two.

Most significantly, a qualitative dye trace at Polldough demonstrated a groundwater pathway to Mt Dough Stream approximately one kilometre to the south. In plain language: water goes underground at Polldough and has been demonstrated to

reappear through the connected system about a kilometre away.

The same chapter identifies the Dartry Limestone as a Regionally Important Aquifer — Karstified Conduit and states that local groundwater flow paths along the GCR/TDR may extend for several kilometres.

8.1 Route-wide investigation is not demonstrated

The Karst Assessment defines the overall project broadly, but its walkovers and ground-investigation campaigns were undertaken to assess karst across the proposed wind-farm site. Geophysics was concentrated at T7, and the intrusive investigation objective was the proposed wind-farm site. Equivalent route-wide intrusive karst investigation of the approximately 32 km GCR has not been demonstrated.

This matters because the applicant itself identified numerous karst features that were not present in the GSI database. The GSI database is acknowledged to be incomplete. Accordingly, the absence of mapped or presently identified karst along the GCR cannot be treated as proof that subsurface voids, conduits or groundwater pathways are absent.

8.2 Internal inconsistency

Against that evidence, Chapter 8 states that because the proposed Grid Connection is principally along public roads and the cable is placed within the road carriageway structure, no groundwater bodies are likely to be encountered. That conclusion requires much stronger route-specific support. A road surface does not remove the underlying geology, groundwater, fractured rock or karst, and the GCR also includes off-road HDD and non-road land.

The issue is not that karst has been proven beneath a particular GCR trench. The issue is that the applicant has not demonstrated the absence of material subsurface constraints through equivalent route-wide investigation.

8.3 Refusal consequence

Where later investigation could reveal a cave, void, swallow hole, conduit or groundwater pathway capable of requiring relocation or material redesign of the cable route, HDD or crossing methodology, the investigation concerns the fundamental suitability of the proposed location. It should not be deferred until detailed design or construction. On the submitted material, hydrogeological suitability has not been demonstrated. The appropriate response is refusal rather than a condition allowing later investigation to determine whether the approved route is suitable at all.

9. Peat Stability, Landslide and Ground Disturbance

The Peat Stability Risk Assessment describes the overall project but its ground investigation is centred on the proposed wind-farm site and expressly states that the report assesses the final turbine locations. Its risk register does not demonstrate equivalent assessment of the full 32 km GCR, HDD locations, culvert trenches and off-road sections.

The assessment itself recognises that excavation associated with electricity infrastructure can induce slope failure even on relatively flat peat. This principle is relevant to underground excavation wherever comparable peat, slope, drainage or groundwater conditions occur.

The applicant-defined statutory GCR must be distinguished from the internal collector cabling within the wind-farm site. However, the overall project contains both systems. Peat, groundwater and stability effects of underground cable excavation must therefore be addressed consistently across the overall project, using local conditions rather than planning-application labels.

A low or negligible risk conclusion for investigated turbine locations cannot simply be transferred to a long linear route without equivalent location-specific evidence.

9.1 Derrybrien Is a Documented Warning from an Irish Upland Wind Farm

Richard Lindsay and Olivia Bragg’s 2005 report, Wind Farms and Blanket Peat: A Report on the Derrybrien Bog Slide, was commissioned by the Derrybrien Development Cooperative Society and affected landowners as an independent review. It is not a statutory determination and it does not prove that Lissinagroagh will fail. Its importance is that it examines an actual Irish wind-farm peat failure and identifies mechanisms and assessment failures that must be tested wherever comparable features occur.

The report records that construction of the 71-turbine Derrybrien wind farm began in July 2003 and that an estimated 450,000 cubic metres of peat moved on 16 October

2003. The initial slide travelled downslope along a natural drainage line. Following later heavy rain, the material was reactivated and travelled through the river system to Lough Cutra, approximately 20 km farther downstream. The report records an estimated fish kill of about 50,000 fish. The consequence was therefore not confined to the turbine base, the forestry block or the wind-farm boundary.

Derrybrien finding	Meaning of the finding	Application to Lissinagroagh
EIA boundary must be iterative	Local erosion or failure can cause sedimentation and ecological effects far from the works.	The Lissinagroagh study area must follow peat, surface-water and groundwater pathways to downstream rivers, lakes, SACs, drinking-water abstractions and private land.

Derrybrien finding	Meaning of the finding	Application to Lissinagroagh
Afforestation can alter peat structure	Drainage, canopy effects and drying may cause deep, persistent fissures along forestry plough lines, dividing peat into less cohesive blocks.	Commercial forestry cannot be treated simply as evidence of previously disturbed or less sensitive ground. Peat condition beneath and beside forestry must be investigated.
Roads alter natural drainage	Roads crossing peat can pond water upslope, dry peat downslope and require drainage to remain serviceable. Sudden release of ponded water can be erosive.	Each new or upgraded access road, hardstand, collector-cable crossing, culvert and drain requires assessment as part of the mountain drainage system.
Excavations have effects beyond their nominal footprint	Turbine-base excavations, stable cut slopes, hardstands, backfill and drainage create a larger disturbed and drained area than the foundation plan alone suggests.	The assessment must address the complete working area, temporary loads, cut faces, hard-core pathways and drainage, not only the finished turbine foundation.

Derrybrien finding	Meaning of the finding	Application to Lissinagroagh
Static Factor of Safety is not the whole risk picture	The report criticises reliance on fixed shear-strength values and static loading where moving machinery, temporary loads, fissuring, ponding and unsupported faces also matter.	Lissinagroagh calculations must demonstrate how spatial variability, construction sequence, vehicle loading, water-pressure fluctuation and local ground disturbance were incorporated.
Moderate peat depth does not eliminate failure	The report found that the main Derrybrien slide arose in an area of moderate peat depth rather than the deepest peat.	Shallow or moderate peat readings cannot alone justify screening out a location; slope, landform, drainage, substrate and disturbance must be assessed together.

Derrybrien finding	Meaning of the finding	Application to Lissinagroagh
Drainage is not automatically a complete mitigation	Drainage may concentrate flow, alter peat hydrology and create consequences if it blocks, overtops or fails during extreme conditions.	Generic commitments to robust drainage require design-level evidence, exceedance analysis, maintenance arrangements and mapped safe discharge pathways before consent.
Failure corridors can be mapped	The report combined peat depth, slope, landform, drainage and forestry to identify potential movement or avalanche corridors.	Comparable spatial modelling is required from turbines, borrow pits, roads, the substation and mast foundations to the Sraduffy, County, Owenmore and other receiving systems.

9.2 Direct Relevance to Dough Mountain, Saddle Hill and the Grid Junction

Lissinagroagh contains the combination that makes the Derrybrien evidence materially relevant: upland blanket peat, commercial forestry, sloping ground, dense headwater drainage, turbine and hardstand excavation, borrow pits, new and upgraded roads, collector-cable trenches, heavy construction traffic and concentrated substation and mast works. The project also contains known or suspected karst pathways, increasing the need to understand where water and mobilised material may travel.

The relevant question is therefore not whether the applicant has calculated a nominal Factor of Safety at selected turbine points. It is whether the submitted information characterises the functioning peatland and mountain system under the temporary and combined conditions created by construction. That requires evidence about peat depth and stratigraphy between tested points; peat cracking and forestry furrows; seepage lines and saturated zones; historical movement; cut and unsupported faces; stockpiles and peat repositories; temporary crane, excavator and vehicle loading; road-induced ponding; culvert blockage or exceedance; and the consequences of a drainage failure.

This is especially important at Saddle Hill and Dough Mountain, including the T1-T4 area, Borrow Pit 1, the open bog and NHA-adjoining slopes, the T7/T8/T13 area and the substation junction. The concentration of cable trenches, excavation, concrete works, drainage and nearby mast foundations beside a surface-water channel cannot be evaluated as isolated structures. The assessment must map the complete downslope routes from each concentrated disturbance area and identify homes, roads, private land, watercourses, protected sites and drinking-water sources that could be affected.

9.3 Downstream Distance Is Part of the Risk, Not a Reason to Exclude Receptors

As explained under Derrybrien in Section 9.1, the Lissinagroagh assessment must follow topography, drainage and receiving waters. It cannot be restricted to Coillte land, turbine-centred survey points or narrowly drawn corridors.

At Lissinagroagh, the assessment must follow the credible receiving pathways in every direction. This includes the Sraduffy-County River-Lough Melvin system; the Owenmore-Lough Gill system; and any karst or surface-water connection towards Lough Melvin, Lough Gill or the Erne catchment. The purpose is not to assert that each pathway will receive a slide, but to establish the consequences if peat, sediment, hydrocarbons, concrete-contaminated water or disturbed drainage enters it.

9.4 Why Construction-Stage Monitoring Is Not an Adequate Answer

The report’s central lesson is that uncertainty about the location or trigger of failure does not justify postponing investigation. Monitoring during construction may identify visible movement after works begin, but it cannot replace the consent-stage evidence needed to decide whether the layout, roads, borrow pits, cable trenches, substation and mast foundations are acceptable in the proposed locations. Fast movement, hidden fissures, subsurface water pressure and sudden release of ponded water may provide little useful warning.

If the necessary investigations could identify a failure corridor, unstable peat mass, sensitive groundwater pathway or drainage arrangement requiring relocation or material redesign, those investigations concern the principle and location of the development. They must be completed before permission. Conditions cannot lawfully or safely assume that later method statements, drainage details or visual inspection will overcome a site-suitability question that has not yet been resolved.

Requested finding

For the Derrybrien comparison, see Section 9.1. In light of the comparable risk factors identified at Lissinagroagh, the Commission should require a transparent, independently reviewable assessment of the complete peat-hydrology-construction system and its potential failure corridors. Unless the applicant demonstrates, before consent, that the proposed development will not initiate or materially increase peat instability and will not endanger downstream receptors, permission should be refused.

10. Flooding, Flashy Runoff, Groundwater and Karst Interaction

The Flood Risk Assessment acknowledges steep terrain, dense headwater drainage and rapid or ‘flashy’ runoff. It also acknowledges that additional karst features were found by the developer despite their absence from national mapping. Some watercourses are not represented in national flood models.

Flooding, karst and peat cannot be treated as isolated topics. Intense rainfall can increase recharge through fissures, swallow holes and conduits; saturated peat and altered drainage can affect stability; excavation and HDD can interact with groundwater; and road/culvert works can alter local drainage.

The objection is not that failure is certain. It is that the combined flood–groundwater–karst–peat mechanisms have not been demonstrated to be adequately characterised for every material part of the permanent grid route.

11. Water Framework Directive, Pollution Pathways and Aquatic Ecology

The applicant's WFD screening excludes the Grid Connection Route from detailed WFD assessment on the stated basis that the individual work areas are limited and present negligible risk. That conclusion requires particular scrutiny for an approximately 32 km linear project involving 11 bridge crossings, including 10 HDD crossings, and eight culvert crossings. A limited footprint at an individual work area does not, without a route-wide analysis, establish negligible cumulative or catchment risk.

The Commission should satisfy itself that the screening was carried out against the final lodged alignment and complete crossing schedule, and that it addresses trench drainage, sediment, drilling- fluid escape, groundwater and karst pathways, culvert and bridge works, cumulative effects and sensitive downstream receptors. If those matters were not examined in sufficient detail, screening the GCR out of detailed WFD assessment is not a reliable basis for the conclusion of no deterioration or no significant effect.

The Water Framework Directive issue is not confined to the formal status of individual water bodies or to a direct accidental spill into a river. Construction of the approximately 32 km underground Grid Connection can itself create new or altered pathways by which polluted water, sediment and other contaminants may reach groundwater and surface-water receptors.

Before construction, rainfall and shallow groundwater movement are controlled by existing soils, peat, subsoil, bedrock, roadside and field drainage and natural topography. Excavating a long cable trench replaces part of that system with a continuous linear corridor of disturbed and backfilled material.

Depending on local conditions, the corridor can intercept water moving across the route and provide a preferential pathway along which water can migrate.

The trench can therefore act both as a collector and a conduit. It can receive rainfall and construction runoff, shallow groundwater, roadside and field drainage, water from adjoining slopes or forestry, and contaminated water generated by excavation and machinery. Where disturbed trench material connects with roadside drains, culverts, streams, fractured rock or groundwater, pollutants entering at one location may be transferred towards a receptor at another.

A public road is not an environmentally sealed corridor. Road drainage is deliberately designed to collect and move water through gullies, ditches, culverts and outfalls. The fact that approximately 30.6 km of the GCR is stated to lie within the public-road corridor therefore does not demonstrate separation from the aquatic environment. In some locations the drainage network may provide the connection between construction works and receiving waters.

Potential pollutants include suspended soil, peat and mineral sediment, concrete or cement- contaminated water, fuels, hydraulic oils, lubricants, drilling fluids, construction chemicals and contaminated runoff. Fine sediment is itself an ecological pressure: it can increase turbidity, settle on riverbeds, smother gravels and benthic habitat, reduce the circulation of oxygenated water through spawning gravels and affect aquatic invertebrates and fish feeding and respiration.

The route includes bridge and culvert crossings, HDD and off-road works. Culverts and bridges are important transfer points because the construction corridor converges directly with natural drainage. HDD avoids open trenching through the riverbed but introduces a subsurface bore and therefore requires assessment of drilling-fluid escape, fractures, groundwater and the pathway beneath the watercourse.

Karst makes this concern more significant. The applicant's own evidence records a qualitative dye trace from Polldough indicating an underground pathway to Mt Dough Stream approximately one kilometre away. In simple terms, water entering the ground at one location has been demonstrated to travel underground and reappear elsewhere. This does not prove that every part of the GCR is karstified; it demonstrates why underground pathways must be investigated wherever comparable hydrogeological conditions occur.

The source-pathway-receptor chain is therefore clear: construction activity, sediment, fuel, concrete, drilling fluid or contaminated runoff -> cable trench, disturbed backfill, groundwater interception, fractured rock, HDD, roadside drain or culvert -> stream, river or groundwater -> aquatic ecological receptor.

The NIS records approximately 920 m of GCR within Lough Gill SAC and multiple watercourse crossings associated with the River Bonet system. Sensitive aquatic receptors include White-clawed Crayfish, salmonids, aquatic invertebrates and fish spawning and nursery habitat. In the wider integrated project, northern drainage systems connect towards Lough Melvin, whose important fish community includes Gillaroo and Arctic charr as well as other salmonids. Pollution effects can therefore extend well beyond the point where material first enters a drain, trench, stream or groundwater pathway.

The same mechanism must be considered consistently for the internal collector cables within the Wind Farm and the statutory 110 kV GCR. The degree of risk varies with local geology, peat, groundwater, slope and proximity to watercourses, but the environmental mechanism does not change merely because a cable lies in a different planning application.

The Grid Connection is therefore potentially both a pollution source and a pollution pathway. Where the complete relationship between pollution sources, the disturbed linear corridor, groundwater pathways, drainage and downstream ecological receptors has not been adequately established, construction- stage mitigation cannot substitute for demonstrating environmental acceptability before permission is granted. This deficiency is directly relevant to the WFD, EIAR, NIS and protected downstream waters and supports refusal.

12. Invasive Alien Species

The route contains Japanese knotweed, Himalayan balsam and Rhododendron records, including locations relevant to the GCR and Lough Gill SAC. Underground cable construction necessarily involves excavation, movement of soil, machinery and spoil.

Cleaning and biosecurity procedures are necessary but do not, by themselves, demonstrate that the practical volume of machinery, contaminated soil, wash water, sediment, fragments, storage, transport and disposal over a route of this scale can be managed without spread. The application should demonstrate operational capacity and route-specific controls, not rely solely on a generic procedure.

13. Roads, Construction Traffic and Road Safety

The applicant’s Stage 1 Road Safety Audit concerns the wind-farm access junctions rather than a demonstrated route-wide Road Safety Audit of the approximately 32 km GCR. Nevertheless, it provides material evidence about the limitations of the same local road environment.

Collision data were not supplied to the audit and the RSA database was unavailable. No previous audit was offered. The turbine-delivery swept-path material used a 16 m HGV rather than the turbine delivery vehicle. The audit identified wheels crossing outside paved road areas and recommended widening. It identified steep junction gradients, narrow existing tracks and a construction-vehicle overturning hazard. Vegetation removal and long-term visibility maintenance were required at locations. An open drain at Site Access 4 created a potential public-road flooding issue. Visibility and geometry concerns were identified at other accesses.

Some recommendations were accepted and some were addressed by alternative designer responses; the audit should therefore not be represented as though every item remained unresolved. Its significance here is different: the applicant’s own audit demonstrates that detailed road-safety scrutiny can identify material issues in this road environment.

No equivalent route-wide GCR Road Safety Audit has been demonstrated in the material reviewed. That is a material assessment gap given the scale of public-road

excavation, traffic management, HDD, culvert works, compounds and interaction with homes, schools and community facilities.

14. Roadside Landowners, Deliverability and Control of Land

Road-safety or visibility measures cannot be treated as automatically deliverable if they require privately owned roadside land, removal of boundaries or vegetation, altered entrances, widening, drainage works or additional visibility splays.

The grid application states that relevant landowner consents have been obtained and that public-road cable works are to be undertaken by a statutory undertaker. That does not establish that every parcel potentially required for later safety mitigation is controlled. The correct evidential question is whether the application demonstrates sufficient legal and practical control over all land required for the development and for any mitigation on which its safety case depends.

Where an identified safety deficiency can only be remedied by works on land not controlled by the developer, the mitigation cannot simply be assumed to be available.

15. Population, Human Health and Community Receptors

The Population and Human Health Chapter considers GCR construction generally but scopes the GCR/TDR out of parts of the detailed population-trend assessment because of their scale and temporary nature. Yet the GCR passes close to community receptors, including Gaelscoil Chluainín, and the noise assessment identifies HDD works near dwellings, a community centre and a national school.

The fact that construction is temporary does not make its effects immaterial. A long linear project can create repeated local disruption along different sections over time. Road access, emergency access, schools, homes, businesses, noise, vibration, dust and construction traffic require route-specific consideration.

16. Noise and Vibration

The noise assessment selected monitoring locations along the underground cable route and considered HDD receptors. It identifies, among others, receptors near Killanummery Community Centre, Dromahair Creamery, Kilcoosey National School and Sheila Mór/Manorhamilton.

These findings corroborate that the GCR is not remote infrastructure. It passes through inhabited and community environments. Noise may not be the principal refusal ground, but it reinforces the need for a complete route-specific construction and traffic assessment.

17. Archaeology and Cultural Heritage

The cultural-heritage appendices identify numerous archaeological receptors close to or immediately adjoining the GCR, including ringforts, enclosures, a graveyard and other recorded features. Several are high-sensitivity receptors.

Where mitigation is expressed as archaeological monitoring followed by further mitigation ‘as required’ and agreed later with the National Monuments Service, the Commission should distinguish between legitimate construction monitoring and investigations that could materially change route design or construction methodology.

The buried nature of the operational cable does not remove construction-phase archaeological risk, nor does it automatically address permanent above-ground works at the substation and telecommunications mast.

18. Deferred Surveys, Detailed Design and the Limits of Conditions

A recurring feature of the application is reliance on future confirmatory surveys, protocols, detailed ground investigation, route verification, utility surveys, otter checks, karst protocols and contractor- developed traffic measures.

There is an important distinction between confirming minor construction details and discovering whether the approved location is fundamentally suitable. A pre-construction survey may verify a known condition. It should not be used to discover a cave, void, unstable ground condition, protected feature, necessary land take or engineering constraint capable of forcing material relocation or redesign after the public-participation process.

Where the missing investigation can determine whether infrastructure can be placed at the proposed location at all, the deficiency goes to the adequacy of the application and should not be cured by condition.

19. Ten-Year Development Horizon and Baseline Reliability

A long commencement period increases the significance of baseline uncertainty. Habitats, forestry, peat condition, drainage, flood experience, invasive-species distribution, otter breeding/resting sites, bird use and local infrastructure can change materially over a decade.

This does not mean that every survey automatically becomes legally invalid after a fixed period. It means the Commission must be satisfied that the present baseline is sufficiently robust and that the project can be assessed now without depending on future surveys to discover fundamental constraints.

The concern is particularly acute where the applicant already proposes confirmatory surveys shortly before construction.

20. Cumulative and In-Combination Effects

The cumulative assessment must include the wind farm, internal collector cabling, permanent substation, statutory GCR, Faughery Wind Farm, relevant existing/proposed generation, works at Srananagh and EirGrid’s strategic North-West reinforcement where there is a realistic interaction.

The key cumulative question is not whether EirGrid’s 220 kV projects are identical to Lissinagroagh. They are not. It is whether the public and decision-maker have been given a coherent assessment of the foreseeable combined infrastructure, road, land, ecological and network consequences of connecting additional generation into a constrained regional system while strategic reinforcement is simultaneously being developed.

21. Prescribed Bodies and Effective Public Scrutiny

The applicant’s August application pack contains letters notifying prescribed bodies. Those letters demonstrate notification; they do not demonstrate substantive assessment or agreement.

At the time of the documentation supplied for this submission, no fresh substantive post-lodgement responses from EirGrid, Leitrim County Council, NPWS/DAU or IFI have been identified in the applicant’s published pack. The statutory submission period must of course be respected, and the absence of a response at an interim stage should not be described as a failure to submit.

However, where a later prescribed-body response introduces significant new environmental or technical information, that information should be made available promptly and the public should have an effective opportunity to take it into account before the decision is made. Otherwise the Commission and applicant may have the benefit of material expert evidence that early public participants had no practical opportunity to address.

22. Material Omissions, Discrepancies and Incorrect or Unsupported Statements

This section records the defects identified by cross-checking the Aquatic Report, the NIS, EIAR Chapter 8, the scoping consultation responses, the Annex I habitat-condition assessment and the lodged drawings. Each item is material because it affects the completeness, consistency or verifiability of the consent-stage assessment. The submission does not assert that every potential effect will occur. It submits that the applicant has not supplied the evidence necessary to exclude the relevant effects with the degree of certainty required before consent.

22.1 Upstream Aquatic Sites 1–12 Cannot Be Disregarded

The Aquatic Report divides 28 survey locations into Sites 1–12 within the Wind Farm and Sites 13–28 at Grid Connection Route crossings. That administrative division does not divide the catchments. Runoff, suspended solids, fuels, concrete-contaminated water or other pollutants released at an upstream Wind Farm site can be conveyed by streams, drains, groundwater, fissures or karst conduits to downstream Grid Connection crossings and protected receptors. Sites 1–12 are therefore no less relevant merely because they are inside the Wind Farm boundary. The actual magnitude of an effect will depend on source, pathway, dilution, timing and receptor sensitivity; it cannot be reduced to zero by a planning or study-area line.

Process consequence: excluding or discounting Sites 1–12 would break the source–pathway– receptor assessment, understate cumulative whole-project effects and prevent a lawful assessment of the functionally interdependent Wind Farm and Grid Connection.

22.2 No Current-Layout Electrofishing Baseline

The 2025 Aquatic Report did not carry out new electrofishing for the current layout. It relies on September 2021 electrofishing undertaken for an earlier layout, while acknowledging that most of the earlier sites do not overlap the current survey locations. Historic data from different locations cannot demonstrate the present fish community, spawning use or nursery function at the current crossing points.

Process consequence: effects on salmonids, lamprey, eel and fisheries habitat have not been assessed against a complete route-specific baseline. That weakens the EIAR, the NIS and the WFD assessment and cannot be cured by post-consent monitoring.

22.3 Incomplete Access and Incomplete Baseline Coverage at Six Grid Connection Locations

The Aquatic Report records that full access was not obtained at six current Grid Connection locations: Site 20 at Lough Carrigeencor, Site 23 at Killananima, Site 25 at Bawn 35, Site 26 at Barroe 35, Site 27 at Rathgeean and Site 28 at Curraghfore. Roadside or boundary observations were made at some locations, so they should not all be described as wholly unsurveyed. Those observations nevertheless do not amount to complete, crossing-specific baseline surveys. Site 23 is the clearest example: the stream could not be properly accessed or seen and substrate, macrophytes, macroinvertebrates and invasive species could not be recorded. These are proposed works locations or connected waters for which material habitat and species conditions remain unverified.

Process consequence: the decision-maker cannot treat locations subject to incomplete access and incomplete baseline coverage as low value, or assume that generic mitigation will be effective there. The gap is material to EIA, AA and the assessment of crossing-specific construction methods.

22.4 Partial Macroinvertebrate and Water-Quality Coverage

Only 16 of the 28 aquatic sites received macroinvertebrate sampling and Q-value/SSRS assessment in 2025. The resulting dataset is spatially incomplete across the overall project. Site 19 was rated Q3/poor and at risk, while Sites 7 and 9 were also identified as at risk and several sites were only moderate. These findings increase, rather than reduce, the need for complete coverage of connected waters.

Process consequence: the application has not established a sufficiently complete ecological-status baseline from which deterioration, pollution risk and mitigation effectiveness can be judged under the WFD and EIA framework.

22.5 Departure from Inland Fisheries Ireland’s Scoping Requirement

The scoping material records Inland Fisheries Ireland’s requirement that electrofishing surveys be undertaken for all waters and that quantitative fish data be provided. The current-layout Aquatic Report does not satisfy that route-wide request. Reliance on selected historic locations is not the same as surveying all waters affected by the final project.

Process consequence: a material expert-consultee requirement remains unanswered. The Commission cannot treat consultation as complete merely because a response was received; the substance of the response had to be addressed in the assessment.

22.6 Incorrect Characterisation of Survey Age

The Aquatic Report refers to previous survey results as being more than five years old. The September 2021 survey was just under four years old when the August–September 2025 fieldwork was undertaken, although any 2020 component may be older. The statement therefore conflates survey dates and is not accurate as applied to the 2021 work.

Process consequence: the error obscures the real problem. The decisive deficiency is not simply age; it is that the historic survey locations largely do not match the current layout and no present electrofishing baseline was obtained.

22.7 Contradiction Concerning Salmonids on the Wind Farm Site

EIAR Chapter 8 states that no salmonid fish were identified on the proposed Wind Farm. The Aquatic Report records salmonids observed at Site 8, likely Brown Trout, and assigns high salmonid suitability to Sites 8 and 10. This is a direct conflict between the hydrology chapter and the specialist aquatic evidence.

Process consequence: the contradiction affects receptor identification, sensitivity and impact magnitude. Until reconciled, the EIAR cannot be relied upon as a coherent statement of the existing environment or likely significant effects.

22.8 Contradiction Concerning Fish-Passage Barriers

EIAR Chapter 8 relies on a large number of natural and man-made barriers said to prevent fish passage. The Aquatic Report states that no barriers were previously recorded in the WFD waterbodies overlapping the survey sites. The documents do not identify the alleged barriers, their locations, passability, survey dates or the evidence by which they isolate particular waters.

Process consequence: an unverified barrier assumption cannot be used to discount fish presence, connectivity or downstream effects. The precautionary assessment must proceed on demonstrated, not assumed, ecological connectivity.

22.9 Inconsistent Protected-Species Account

The Aquatic Report documents Atlantic Salmon, Brown Trout, lamprey, White-clawed Crayfish and Otter, and says European Eel and Kingfisher were not recorded but are ‘inevitably present’. Its conclusion then refers to six protected species without clearly identifying the sixth or explaining whether an unrecorded species has been treated as present. The account is internally unclear.

Process consequence: the species baseline and the list of receptors carried into impact assessment must be explicit and auditable. Ambiguity prevents the public and decision-maker from checking whether each protected species and conservation objective has been assessed.

22.10 The Polldough Dye-Trace Claim Is Not Verifiable from the Submitted Material

EIAR Chapter 8 relies on a qualitative dye trace said to demonstrate a groundwater pathway from Polldough to Mt Dough Stream approximately one kilometre to the south. The application material examined does not provide the underlying trace report setting out the tracer, injection point, monitoring locations and duration, flow and rainfall conditions, detections and non-detections, recovery, travel time, analytical method or limitations. The submission does not deny that a trace was undertaken; it objects that a central hydrogeological result cannot be independently examined.

Process consequence: withholding the methodological and results record prevents meaningful scrutiny of the conceptual hydrogeological model, pathway extent and mitigation assumptions. It is a material information and public-participation defect, particularly because the claimed result proves rapid subsurface connectivity within the project setting.

22.11 Karst Risk Is Not Confined to Visible Features

The applicant identifies 76 potential karst features, including two swallow holes, and describes Polldough as approximately 50 m deep and about 170 m north-east of T7. Avoiding mapped surface features does not establish the absence of concealed conduits, fissures, voids, recharge zones or groundwater connections beneath excavations, HDDs, joint bays or roads. The applicant’s own work found features absent from the national database.

Process consequence: a setback from visible features is not a substitute for a location-specific conceptual model and investigation. Where later investigation may force relocation, redesign or a different AA conclusion, the matter is fundamental and cannot lawfully be left to detailed design.

22.12 Study-Area Boundaries Are Used as If They Were Hydrological Boundaries

EIAR Chapter 8 defines a two-kilometre Wind Farm study area and a 200 m corridor around the GCR/TDR, then discounts cumulative effects beyond those limits by reference to increased flow and distance. No catchment-wide evidence is supplied to show that those fixed buffers contain the relevant surface water or karst groundwater pathways. The Aquatic Report itself identifies drainage to the Drowes/Lough Melvin, Garvoge/Lough Gill and Erne catchments and states that Wind Farm streams can act as vectors for suspended solids affecting downstream salmonid habitat.

Process consequence: likely effects must be delineated by pathways and receptor sensitivity, not an applicant-selected radius. The present approach risks excluding indirect, cumulative, downstream and transboundary effects before they are assessed.

22.13 The Claimed Absence of Significant Limitations Is Unsupported

EIAR Chapter 8 states that no significant difficulties or limitations affected the reliability of the assessment. That assertion is irreconcilable with incomplete access and incomplete baseline coverage at six current GCR aquatic locations, partial macroinvertebrate coverage, no current-layout electrofishing, sparse groundwater-level evidence, no active hydrometric station relied upon for the relevant reaches, and the absence from the examined material of a full Polldough dye-trace report.

Process consequence: limitations must be disclosed and carried into the evaluation of confidence and residual uncertainty. Describing an incomplete baseline as unaffected by significant limitations overstates the reliability of the EIAR and NIS conclusions.

22.14 Surface-Water Sampling Is Too Sparse to Establish Variability

The hydrology material relies on sampling on 21 July 2021, January 2025 and 22 October 2025. It describes the results as representative of seasonal and multi-year conditions while also recognising that a sample is a one-off snapshot. Reported turbidity can change from below 5 NTU in baseflow to 20 NTU or more than 200 NTU during heavy rainfall. Three snapshots cannot characterise the frequency, duration and ecological consequence of such event-driven changes across the connected catchments.

Process consequence: without adequate temporal coverage, the assessment cannot robustly establish baseline variability, distinguish construction effects or demonstrate that proposed trigger levels and mitigation will prevent deterioration.

22.15 The Exceptional 2023 Weather Demonstrates Why Correctly Timed Repeat Sampling Was Necessary

The weather record demonstrates that a small number of isolated samples cannot safely be treated as representative of the conditions governing these upland and downstream waters. Met Éireann's completed, quality-controlled national analysis confirms that 2023 was Ireland's wettest year on record since the national rainfall series began in 1941, with a gridded national average of 1,510.9 mm. March and July 2023 were the wettest March and July on record, at 185% and 201% respectively of the 1991- 2020 Long-Term Average, five months exceeded 135% of their monthly average, and flooding occurred during Storm Betty in August and Storm Babet in October. The separate 2023 rainfall and river-flow material reviewed for this submission records 1,358 mm annual rainfall, approximately 22% above its 1991-2020 average, and 1,258 mm annual river flow, approximately 27% above average, with prolonged wet periods and particularly high flows during parts of the year. These figures are not substituted for measurements at each project watercourse; they demonstrate the scale of inter-annual, seasonal and event-driven variability that the project baseline needed to capture.

Sampling under only one type of flow condition can materially alter the apparent result. High-flow or post-rainfall sampling may record increased turbidity, suspended peat and mineral sediment, organic matter and nutrient mobilisation, while the larger volume of water may simultaneously dilute some dissolved contaminants. A sample taken after the pollution pulse has passed can miss the peak altogether. Low-flow sampling may show higher concentrations of some dissolved substances but fail to represent storm-driven sediment transport, rapid karst recharge, drain and culvert connectivity or the operation of flash-flood channels. For biological sampling, exceptional flows can scour the bed, displace macroinvertebrates and fish, alter accessible habitat and affect the assemblage observed until recovery or recolonisation occurs. Season and life-cycle timing also affect detectability. Correct assessment therefore required sampling dates to be matched with antecedent rainfall and measured flow, together with repeat coverage of baseflow, normal seasonal conditions and significant rainfall events at the same relevant locations.

This is not confined to water sampling. A reliable EIAR and NIS must be founded on a coherent evidence base in which official monitoring and regulatory records are identified and reconciled with sufficiently current, representative and methodologically sound project-specific surveys undertaken by appropriately qualified persons. That principle applies to rainfall, river flow, water quality and aquatic ecology, and also to ornithology and other ecological receptors. Official measurements do not remove the need for site-specific fieldwork, while isolated site visits cannot displace contrary or materially relevant official records. Survey timing, locations, methods, weather and flow conditions, limitations and omitted areas must therefore be disclosed so that the evidence can be tested and the resulting conclusions reproduced or critically examined.

Process consequence: the application does not demonstrate that its limited 2021 and 2025 snapshots, partial 2025 macroinvertebrate coverage and historic non-overlapping

electrofishing sites capture the range of conditions illustrated by 2023. Without contemporaneous rainfall and flow context and correctly timed repeat sampling, an apparently satisfactory result may reflect dilution, a missed pollution pulse, seasonal detectability or post-flood disturbance rather than the true baseline. This materially reduces confidence in the EIAR, NIS and WFD conclusions and in claims that mitigation will prevent downstream deterioration. The same evidential problem arises where necessary bird surveys or other receptor surveys are absent, incomplete or unrepresentative: impacts may be omitted or understated, prescribed bodies may formulate observations on an incomplete evidential record, the public cannot participate effectively, and the competent authority may be asked to reach its final planning and Appropriate Assessment conclusions without the complete and reliable information required at consent stage. A later condition, contractor plan or post-consent survey cannot cure a baseline omission where the missing evidence is necessary to identify, assess or exclude significant effects.

22.16 Habitat-Condition Survey Limitations Are Material

The Annex I habitat-condition assessment was based on three zones selected by FuturEnergy and a two-day survey on 23–24 September 2024. It acknowledges that small or concealed habitats may have gone undetected, that the late botanical season may underestimate limestone-pavement flora, that boundaries involve surveyor judgment, and that delineation may require revision when peat-depth information is considered. It nevertheless identifies H7130 blanket bog, priority H7130* active blanket bog, priority H8240* limestone pavement and deep bog depressions presumed to be sinkholes.

Process consequence: acknowledged survey constraints concern priority habitats and possible karst features, not minor details. They must be reflected in the assessment of land take, drainage, groundwater and cumulative effects and cannot be treated as immaterial uncertainty.

22.17 NIS Certainty Is Undermined by the Baseline Gaps

The NIS treats the Wind Farm, substation, approximately 32 km GCR and TDR works as one Proposed Project. It identifies 13 European sites for which adverse effects could not be excluded without mitigation, including Lough Gill SAC, Lough Melvin SAC and Lough Melvin SAC in Northern Ireland, and records about 920 m of the GCR within Lough Gill SAC. Its conclusion of no adverse effect depends on mitigation, future verification, detailed design and monitoring despite the aquatic and hydrogeological uncertainties set out above.

Process consequence: under the precautionary Article 6(3) test, consent may be given only where the competent authority is satisfied that no adverse effect on site integrity remains beyond reasonable scientific doubt. Missing current-layout fish data, inaccessible crossings, unresolved contradictions and unverified groundwater pathways prevent that conclusion on the submitted record.

22.18 Drawing Errors and Deferred Design Reduce Clarity

The versions compared between the applicant's/Tobin's material and the Board material were exact matches for 31 unique drawings; no conflicting paired version was identified in that comparison. That useful finding does not remove document-control defects. Drawing 05773-DR-148 carries inconsistent project and sheet numbers (05-775/05775 rather than 05-773/05773); Drawing 05773-DR-122b is labelled as a no-ECC detail but contains a caption referring to a 'with ECC duct' and a date shown as 21.04.06; Drawing 05773-DR-121a contains 'Wind Fram'. The drawings also state that precise cable, joint-bay and chamber positions remain subject to detailed design, liaison, approval and micrositing.

Process consequence: typographical errors alone would not justify refusal, but inconsistent identifiers and contradictory captions impair document traceability. More importantly, future micrositing and final positioning cannot be used to postpone assessment of land take, crossings, drainage, archaeology, ecology or effects on third-party property until after consent.

22.19 Further Document-Control Errors

The NIS contains obvious drafting defects, including duplicated wording ('adverse effectseffects'), 'Northen Ireland', inconsistent 'Sranagh/Srananagh' references and a sentence fragment beginning 'Following the implementation of these mitigation measures.' EIAR material also uses IE00428 for Lough Melvin SAC instead of the official site code 000428. These mistakes must be distinguished from the more substantive evidential defects above.

Process consequence: individual typographical errors may be harmless, but their accumulation requires careful checking of site identity, transboundary screening, cross-references and mitigation commitments. They cannot be allowed to mask uncertainty about which receptor, route or measure was actually assessed.

22.20 Overall Effect on the Decision-Making Process

Taken together, these are not a request for the applicant to perfect its paperwork after permission. They show that the current application does not provide a complete, internally consistent and publicly verifiable assessment of the real integrated project. The gaps affect identification of the receiving environment, the existence and extent of pathways, the sensitivity of receptors, the selection of crossing and construction methods, the effectiveness of mitigation and the residual effects on European sites and WFD water bodies. Conditions requiring later surveys, detailed design or monitoring would transfer the substantive assessment beyond the consent and public-participation stage.

The appropriate decision is refusal. If the applicant wishes to advance a materially revised project, the necessary current-layout aquatic surveys, accessible crossing inspections, route-specific ground and karst investigations, complete dye-trace evidence, coherent catchment assessment and fixed environmentally assessed design should be assembled first and exposed to fresh public and statutory scrutiny.

23. Principal Grounds for Refusal

The detailed evidential grounds are set out once in Sections 8–22. For decision-making purposes, they may be grouped without repeating the underlying observations:

Incomplete and inconsistent baseline evidence — current-layout aquatic data, incomplete access and baseline coverage at six Grid locations, partial macroinvertebrate coverage, no dedicated Grid- route bird surveys, and unresolved contradictions (Sections 11 and 22.1–22.9). Unresolved source–pathway–receptor risk — demonstrated karst connectivity, route-wide investigation gaps, peat, flooding, drainage, protected waters and the limits of construction-stage monitoring (Sections 8–11 and 22.10–22.17). Incomplete project definition and assessment — the permanent 23 m mast, route-length discrepancy, drawing errors, micrositing and matters deferred to detailed design (Sections 2A, 18 and 22.18–22.20). Deliverability, safety and participation deficiencies — access and land control, road safety, route-community consultation, prescribed-body scrutiny and the evolving EirGrid programme (Sections 3 –7, 13–14 and 21).

Taken cumulatively, these are consent-stage deficiencies in the evidence for the integrated project. They are not cured by repeating mitigation commitments or by postponing investigations whose results could require relocation, redesign or a different Appropriate Assessment conclusion.

24. Conclusion

The approximately 32 km Grid Connection, substation, control building, telecommunications mast, crossings, HDD and off-road works form part of the same functionally interdependent environmental project as the Wind Farm. The common EIAR and NIS must therefore be adequate for the integrated project as a whole.

The specific consent-stage deficiencies are evidenced in Sections 1–22 and in Section 23. They include material baseline gaps, unresolved karst and water pathways, incomplete route- specific surveys, omitted assessment of permanent infrastructure, discrepancies in the project description and reliance on later investigations capable of changing the design or the Appropriate Assessment conclusion.

Accordingly, it is respectfully requested that An Coimisiún Pleanála REFUSE permission for the Lissinagroagh Grid Connection Route and 110 kV Substation under current application reference VA12.324597 / ACP-324597-26.

Submitted by: Joseph Sheerin

Date: 15 October 2026

Appendix A — Key Documentary Evidence Relied Upon

Lissinagroagh Grid Connection SID application form and 21 August 2026 cover letters. Lissinagroagh EIAR Non-Technical Summary. EIAR Chapter 7 — Land, Soils and Geology. EIAR Chapter 8 — Hydrology and Hydrogeology. Appendix 7-2 — Karst Assessment. Peat Stability Risk Assessment. Water Framework Directive Assessment and Flood Risk Assessment. Natura Impact Statement. EIAR Chapters 4, 5 and 6 — Population & Human Health, Biodiversity and Ornithology. Road Safety Audit and Traffic Management material. Cultural Heritage appendices. Leitrim County Council presentation of 11 March 2026 and related consultation record. EirGrid, Powering Up the North West, September 2025, and associated Step 4 / technology-option material. Applicant’s 21 August 2026 notification letter to EirGrid.

An Coimisiún Pleanála, pre-application case VC12.323353 / ACP-323353-25: second meeting record dated 30 March 2026 and closure letter dated 17 June 2026.

Applicant's Water Framework Directive screening material: GCR screened out of detailed assessment by reference to limited work areas and negligible risk; compare the final route and crossing schedule of approximately 32 km, 11 bridge crossings including 10 HDD crossings, and eight culvert crossings.

An Coimisiún Pleanála, live case listing for VA12.324597 / ACP-324597-26 (lodged 21 August 2026).

EIAR Chapter 2, Description of the Proposed Project, section 2.5.8: approximately 32 km total GCR; approximately 30.6 km in public-road corridor.

EIAR Chapter 9, Noise and Vibration, section 9.6.2.5: GCR stated to span 36.5 km. Earlier preferred- route material also gives approximately 33.5 km. These figures should be reconciled against the final route drawings and every topic assessment.

Submitter’s 29 June 2026 information request to EirGrid (no reply received as reported by submitter). AASR Appendix 2 — Scoping Consultation Responses. AASR Appendix 3 — Aquatic Report (2025 fieldwork and earlier fish-survey material). AASR Appendix 4 — Annex I Habitat Condition Assessment. AASR Appendix 5 — Chapter 8 of the submitted EIAR. Grid Connection drawing index and drawings 05773-DR-119 to 151, including matched Board/applicant versions examined. European Commission, Assessment of plans and projects in relation to Natura 2000 sites — Methodological guidance on Article 6(3) and (4) of the Habitats Directive (2021/C 437/01). NPWS site documentation for Lough Melvin SAC (site code 000428) and Lough Gill SAC (site code 001976).

Met Éireann, 2023 confirmed as Ireland's wettest year on record, issued 10 July 2024, together with the 2023 rainfall and river-flow material reviewed for this submission. Applicant's community-engagement material and public submissions concerning the Wind Farm consultation process, considered alongside the Grid SID statutory notice and inspection material. Lindsay, R. and Bragg, O. (2005), Wind Farms and Blanket Peat: A Report on the Derrybrien Bog Slide, second edition, University of East London.

Appendix B — Important Terminology

Statutory Grid Connection Route (GCR): the permanent approximately 32 km 110 kV underground route from the on-site substation to Srananagh, together with the permanent on-site substation and associated Section 182A works.

Internal electrical / collector cabling: underground cabling connecting the 14 turbines to the on-site substation. This forms part of the wind-farm application, not the statutory 32 km GCR.

Overall Proposed Project: the wind farm, internal electrical system, on-site substation and statutory GCR considered together for EIA/NIS because the applicant expressly states that the two applications are functionally interdependent and constitute a single project for EIA.

Detailed grounds - source page 58

Appendix C — Missing Tests and Environmental Consequences

Examples of how missing tests could affect bog movement, site and route selection, river pollution, fish and White-clawed Crayfish. The absence of a test does not itself prove that damage will occur; it means that the applicant may not have a sufficiently complete and reliable basis for excluding the risk.

Required test, survey or investigation What could remain unidentified Potential physical or environmental effect Effect on EIAR/NIS and planning process Comprehensive peat-depth probing Deep peat pockets and abrupt changes between isolated probe locations

Foundations, roads or drainage works could be placed on unsuitable peat, causing settlement, cracking or movement

The assessed site location and peat volumes may be inaccurate

Peat shear-strength and laboratory testing Weak peat layers and potential failure surfaces Loading, excavation or vibration could initiate lateral movement or peat failure

Stability calculations may overstate the margin of safety Pore-water pressure and groundwater monitoring Saturated layers and the response of peat to prolonged rainfall

Dry-weather observations may not represent the conditions in which failure is most likely Rainfall monitoring reconciled with official 2023 The response of the site to exceptional rainfall and prolonged wet periods

Higher water pressure can reduce peat strength and increase instability

The EIAR may underestimate extreme but reasonably foreseeable conditions Bog hydrology and drainage investigation Natural underground and surface drainage pathways Roads and drains may dry one area while increasing saturation or concentrating flow elsewhere

Saturated peat, increased runoff, erosion and higher river flows

Drainage mitigation may transfer rather than prevent risk Slope-stability analysis extending beyond infrastructure locations

The study boundary may exclude the source or full path of a potential peat slide Investigation of exposed peat faces and existing Evidence of historic or continuing instability Construction could reactivate existing cracks, slips or unstable margins

Failure surfaces beginning outside narrowly defined investigation areas

Peat movement could originate above a turbine or road and travel through the site

A stable baseline may be based on incomplete examination Route-wide intrusive ground investigation Soft ground, peat, unstable verges, shallow groundwater, rock or buried services

The route ultimately built may differ materially from the route assessed Geophysical surveys, including electrical Caves, voids, fractured limestone and deeply weathered ground

Cable trenches and joint bays may require relocation or different construction methods

Site and route suitability cannot be reliably determined before consent Properly documented dye tracing Direction, speed and destination of underground water movement

Excavation could intersect cavities or create rapid pollution pathways

The source-pathway-receptor model may be incomplete or incorrect Groundwater-level and spring monitoring Seasonal groundwater changes and unrecorded springs

Pollution could disappear underground and emerge rapidly in another stream or catchment

Trenches or foundations could intercept groundwater and redirect it toward rivers

Dewatering and drainage effects may be understated

Investigation of the identified cave and swallow Connections between the Wind Farm, Grid route and downstream waters

An administrative boundary may wrongly be treated as a hydrological boundary Crossing-specific river and stream surveys Bank instability, spawning gravels, crayfish refuges, springs and flood channels

Pollutants from Sites 1-12 could travel beyond the defined study area

Generic crossing details cannot establish that each actual crossing is acceptable Assessment of all drains, culverts and temporary Smaller pathways activated during heavy rainfall Sediment or contaminated runoff could bypass mitigation and enter rivers

The selected trenching or crossing method may damage sensitive habitat

Pollution pathways and affected water bodies may be omitted Continuous turbidity monitoring Short periods of severe sediment pollution Sediment pulses may damage aquatic habitats before being detected

Occasional spot samples may give a misleadingly satisfactory result Water sampling across baseflow, normal flow and Seasonal and storm-driven changes in water quality High flows may mobilise peat and sediment while diluting some dissolved pollutants

One flow condition cannot represent the full baseline

Antecedent-rainfall and measured-flow records Whether results were influenced by drought, rainfall, flooding or dilution

Pollution peaks may be missed or understated Sampling results cannot be properly interpreted or compared

Detailed grounds - source page 59

Required test, survey or investigation What could remain unidentified Potential physical or environmental effect Effect on EIAR/NIS and planning process Sampling during or immediately after pollution- Brief pollution pulses following excavation or intense rainfall

Monitoring may record the river only after pollution has dispersed Current electrofishing at final-layout locations Fish species, age classes and spawning populations at affected crossings

Pollutants could pass downstream between scheduled visits

Historic or non-overlapping data cannot establish the current baseline Repeat seasonal fish surveys Fish moving between spawning, nursery and feeding habitat

Sediment may cover spawning gravels, injure fish gills and reduce food supply

A single absence record may be wrongly treated as proof of absence Surveys at inaccessible and omitted aquatic sites Fish or sensitive habitat at locations omitted from fieldwork

Important seasonal habitat may be disturbed at the most sensitive time

An inaccessible site remains an evidence gap, not a finding of no impact Macroinvertebrate surveys at all relevant locations Existing ecological quality and fish food resources Sediment and water-quality deterioration may reduce aquatic insect communities

Unexamined crossings may receive unsuitable construction treatment

Partial coverage weakens the ecological baseline and WFD assessment Targeted White-clawed Crayfish surveys Crayfish sheltering under stones, roots and banks Sediment can fill refuges; chemicals or cement wash water can cause mortality

One limited visit does not establish absence

White-clawed Crayfish biosecurity assessment Risk of transferring crayfish plague between watercourses

The NIS may omit a potentially serious construction pathway Sediment-deposition and spawning-gravel Locations where fine material could settle Sediment can smother fish eggs and reduce oxygen within gravel

Machinery, boots and equipment could spread a fatal aquatic pathogen

Downstream effects may exceed those predicted from water chemistry alone Pollution-plume and downstream-connectivity How rapidly peat, sediment or chemicals could travel Pollution inside the Wind Farm could affect habitats far outside it

Sites 1-12 cannot be excluded because they lie outside the Grid study area Cumulative assessment of Wind Farm and Grid Combined sediment, drainage and pollution pressure Separate small discharges may combine within downstream rivers

Separate assessments may understate the integrated project's effects Grid-route bird surveys Hunting areas, flight paths, breeding locations and seasonal use

Wind-farm surveys do not automatically represent the 32 km Grid route Surveys around the telecom pole and lightning Use of tall structures by raptors and other birds A bird of prey may use a suitable fitting or platform as a lookout or resting perch

Construction may disturb birds or remove feeding and movement habitat

Potential perching, disturbance and associated effects remain unexamined Bat surveys along hedgerows, bridges and rivers Commuting routes, feeding areas and nearby roosts Vegetation removal, lighting and construction could disturb bats

Wind-farm surveys cannot substitute for route-specific evidence Verification against official monitoring and regulatory records

Prescribed bodies and the public may receive an incomplete account Disclosure of survey timing, methods and Whether evidence is reproducible or representative Material uncertainty may be concealed by a no- significant-effect conclusion

Conflicts between project results and official environmental data

The assessment may rely on an unrepresentative snapshot

The public and competent authority cannot critically examine the conclusions Completion of essential surveys before consent Effects discovered only during construction Locations and methods may have to change after permission

Conditions or post-consent surveys cannot cure a missing consent-stage baseline

Detailed grounds - source page 60

Overall Consequence

Result Inadequate peat and ground testing An unsuitable turbine, road, borrow-pit, substation or cable location may be selected Unsuitable location plus excavation, loading, drainage and exceptional rainfall Peat movement, erosion, groundwater disturbance or instability may occur Peat, sediment or contaminants enter drains, caves, swallow holes or rivers Pollution can travel beyond Wind Farm and Grid study boundaries Pollution reaches downstream aquatic habitat Fish spawning grounds, macroinvertebrates and White-clawed Crayfish may be harmed Baseline evidence is incomplete Effects may be omitted or understated in the EIAR and NIS EIAR and NIS conclusions are unreliable Prescribed bodies and the public may respond to incomplete information Material uncertainty remains at consent stage The competent authority cannot safely exclude significant effects or adverse effects on European-site integrity

Essential baseline evidence cannot properly be deferred to contractor investigations, construction plans or post- consent monitoring where it is required to determine the location, design or environmental acceptability of the development.

Part Two Additional Evidence and Findings

This part examines the specialist reports, engineering drawings and Planning Statement in further detail. These findings form part of my observation and support my request for refusal and for cross-notification to the officers and inspectors determining the related Wind Farm application.

1. Phase 1 turbine and swallow-hole drawing

Figure 1, PDF page 13 of the Phase 1 Ground Investigation Report, is titled “Turbine and Swallow Hole Locations” and is dated 8 September 2021. The date belongs to the drawing; the completed Phase 1 Ground Investigation Report is dated 7 February 2022. The drawing concerns the earlier 22-turbine layout. The sixteen numbered red symbols are gouge investigation locations; they are not the turbine count. The drawing identifies three swallow holes but does not demonstrate boreholes, dye tracing, groundwater monitoring or direct physical investigation of those features. No equivalent updated ground-investigation drawing has been identified overlaying the final 14 turbines, roads, hardstandings, borrow pits, substation and mast with all recorded karst features.

Conclusion: The only early combined turbine/swallow-hole drawing is based on a superseded layout and does not demonstrate adequate investigation of the final project.

2. Boreholes, trial pits and infrastructure locations

Borehole evidence must be assessed against the current 14-turbine layout, not the superseded layout. The boreholes do not correspond with most current turbine-foundation locations. The apparent closest turbine correspondence is T10. The large borrow pit on the Dough Mountain side of the road is separated from Borehole 4; no borehole is shown within or immediately beside that borrow-pit footprint. No borehole is shown beside the turbines close to Saddle Hill. Borehole 5 is separated from T1 and lies closer to the Lattone River. It provides information only for its own locality and does not establish foundation conditions at T1. Trial pits identify shallow soil, peat and overburden conditions but do not replace rotary boreholes through bedrock. Distant boreholes cannot establish rockhead, bearing strata, weathering, fractures, cavities, karst, groundwater conditions or recoverable rock volume at the actual infrastructure locations.

Conclusion: Comments based on distant boreholes are not reliable evidence of conditions beneath the current turbine foundations or borrow pits. Location-specific foundation and borrow-pit evidence was not supplied before consent.

3. Groundwater-monitoring duration

Short-duration or isolated groundwater readings do not establish seasonal maximum and minimum levels. The monitoring does not demonstrate response to prolonged rainfall, extreme storms, rapid karst recharge, fracture pressure, peat–groundwater interaction or underground connections with springs, caves, swallow holes and downstream rivers. One groundwater reading is evidence only of conditions at that location and time.

Conclusion: The limited monitoring period does not characterise the site’s seasonal and rainfall- responsive groundwater regime and cannot support definitive conclusions of no significant effect.

4. Later karst and ground investigations

Phase 2 work in 2024 was undertaken by Causeway Geotech Ltd. The 7 October 2024 geophysical work was undertaken by APEX Geophysics Ltd. Phase 3 fieldwork in 2025 and the April 2026 Phase 3 report were undertaken by Ground Investigations Ireland Ltd. TOBIN Consulting Engineers prepared the overall Karst Assessment and supervised/coordinated the investigations for FuturEnergy Ireland. The Karst Assessment reports 73 possible karst features, including three swallow holes.

The targeted geophysical survey associated with T7 was approximately 170 metres west of the identified swallow holes, not through the swallow holes. No complete direct investigation of each swallow hole, cave and underground receiving pathway has been identified. The Karst Assessment defers boreholes at every turbine and further geophysics to detailed design or pre- construction.

Conclusion: Later desktop work, walkovers and a limited geophysical survey do not cure the absence of direct investigation of the swallow holes or location-specific investigation of the final infrastructure.

5. FuturEnergy Ireland and inherited evidence

FuturEnergy Ireland was established in 2021 as a 50:50 Coillte–ESB joint venture and publicly launched on 30 November 2021. Figure 1 dated 8 September 2021 predates that public launch and arose from the earlier Coillte-led project. FuturEnergy Ireland inherited the earlier investigation material and was responsible for reviewing and validating it against the final 14-turbine proposal.

Conclusion: Reliance upon inherited investigation material prepared for superseded layouts does not demonstrate adequate investigation of the final project.

6. Prescribed-body consultation chronology

Original 2021 responses identified Sligo Airport — 10 May 2021. Inland Fisheries Ireland — 15 June 2021. Geological Survey Ireland — 16 June 2021. Uisce Éireann/Irish Water — 14 July 2021. Love Leitrim/Communities for Environment First — response relating to the 2021 scoping exercise.

Updated consultation An updated Scoping Report was issued in December 2024 with responses requested by 24 January 2025. The recorded responders included government departments, DAU/NPWS/NMS, GSI, Leitrim County Council, Donegal County Council, Fermanagh and Omagh District Council, OPW, TII, Uisce Éireann, EirGrid, Fáilte Ireland, HSA, IAA and Bat Conservation Ireland. The combined appendix does not clearly distinguish substantive technical responses, acknowledgements, generic guidance and older responses. Inland Fisheries Ireland gave no new response; the application relies on its 2021 response. The EPA, HSE, Sligo County Council, Northern Ireland Department for Infrastructure, BirdWatch Ireland and the Irish Raptor Study Group were among the bodies recorded as not responding. The updated consultation preceded the 2025 Phase 3 investigations, the April 2026 Phase 3 report, the completed Karst Assessment and the final lodged layout.

Conclusion: Scoping responses are not approval or technical validation of the completed EIAR and NIS. Consultees did not review the completed 2025–2026 evidence when making their scoping responses.

7. Storm Éowyn and the proposed borrow pit

Leitrim County Council’s response dated 27 January 2025 expressly required consideration of major accidents and disasters in light of Storm Éowyn. The published records examined do not show that any prescribed body connected the extensive windthrow beside the proposed borrow-pit area with that borrow pit. No published record has been identified showing that FuturEnergy Ireland or TOBIN informed Leitrim County Council of the approximately 300 m by 100 m windthrow area beside the proposed borrow pit. No documented post-storm geotechnical, peat-stability, hydrological or forestry reassessment of the borrow- pit location has been identified. No revision of borrow-pit stability, available-material volumes, drainage assumptions or groundwater conclusions has been identified. The application was lodged approximately sixteen months after Storm Éowyn, providing time for inspection and disclosure.

Conclusion: The absence of a disclosed post-storm reassessment leaves the borrow pit's suitability, stability, material volume and environmental effects unestablished. This is a consent-stage feasibility deficiency supporting refusal.

8. Evidential language to retain

Where a negative fact has not been conclusively established by all possible private correspondence, use: "No record has been identified in the published application documentation examined." Do not treat absence of a prescribed-body response as approval. Do not describe scoping consultation as review of the completed EIAR. Do not transfer findings from a distant borehole to a turbine or borrow pit without evidence of comparable ground conditions. Do not describe future confirmatory investigation as curing missing consent-stage evidence where it could require relocation or material redesign. Connect each omission to its consequence and conclude that permission should be refused.

9. Continuing instruction

All further submission-ready sections, factual corrections, tables, maps, report references, evidential qualifications and recommended refusal grounds advised during this workstream are to be added to this register and retained for incorporation into the submission.

10. Phase 2 Appendix A - exploratory-hole distribution and representativeness

The 2024 Site and Exploratory Hole Location Plan shows two exploratory holes in the open ground of Area 4. The remaining exploratory holes appear to be within forestry or at its immediate edge. A location in forestry, at a forestry edge, or in one open area does not establish comparable peat, bedrock, groundwater, karst or foundation conditions throughout the open upland ground, Saddle Hill, the Dough Mountain slopes, each turbine base, each borrow pit and every material infrastructure footprint. The exploratory-hole evidence must be tied spatially to the final infrastructure and to the environmental setting it is being used to represent.

Conclusion: The investigation pattern does not demonstrate representative direct investigation of all material open-upland, peat, slope, karst and infrastructure locations. Results from forestry and forest-edge locations cannot be transferred to materially different ground without evidence demonstrating comparability.

11. Phase 2 Appendix D - trial-pit photographic traceability

Most trial-pit photographs show the excavation and an identification board but provide little or no wider landscape context. TP245 is the clearest photograph showing a broader setting, although the precise position remains difficult for a member of the public to verify from the photograph alone and nearby trees form part of the visible context. A close photograph of a hole records the material exposed in that hole; it does not by itself demonstrate where the hole lies relative to a final turbine, hardstanding, road, borrow pit, slope, drainage feature, cave, swallow hole or study-area boundary.

Conclusion: The photographic record is insufficiently traceable to the wider landscape and final project layout. The applicant must provide a clear cross-reference between every exploratory location, coordinates, final infrastructure, ground level, photographs and relevant environmental features before the results can be independently verified.

12. Phase 2 Appendix F - peat-auger logs

The peat-auger logs contain no photographs identifying the wider setting of the auger locations. Coordinates and log identifiers are useful, but photographs and a final-layout overlay are needed to permit straightforward public verification of whether the logged point represents open bog, forestry, forest edge, modified peat, slope, drainage ground or the actual infrastructure footprint. An auger point establishes conditions only at that point and cannot define the continuity, stability or hydrology of the peat between sparse points.

Conclusion: Appendix F does not provide a visually or spatially transparent record demonstrating that the peat-auger results characterise the final infrastructure locations and connected peat slopes. The omission weakens independent verification of the peat baseline.

13. Phase 2 Appendices G and H - direct laboratory evidence, geophysics and breaking/blasting

Appendix G contains the geotechnical laboratory test results. Those results must be cross-referenced to the precise exploratory hole, sample depth, final infrastructure location and geological unit; laboratory results do not cure an unrepresentative field-investigation pattern. Appendix H is the APEX Geophysics Ltd report dated 13 December 2024. It states that the geophysical field survey undertaken on 7 October 2024 was intended to assess subsoil conditions at one proposed turbine base. However, the report does not identify that base by a current turbine number or demonstrate that its survey profile corresponds with any foundation in the final 14-turbine layout. Its stated objectives were to provide information on soil stiffness, type and thickness; depth and type of bedrock; bedrock weathering and excavatability; potential fault/fissure zones; and proposed direct- investigation locations. The surveyed open hillside lies about 120 metres from the access road to the west and rises from 326.4 mOD in the northwest to 347.1 mOD in the southeast. Rock is exposed south of the survey area. The report records GSI mapping of blanket peat across the site, bedrock outcrop or subcrop west of the profile and karstified bedrock outcrop or subcrop northeast of it. It also records high groundwater vulnerability, rock at or near the surface or karst southwest and northeast of the profile, and a Regionally Important Aquifer — Karstified (conduit). The survey comprised one ERT profile, three seismic-refraction profiles, three 1D MASW soundings and 29 soft-ground probes. Additional direct-investigation information was incorporated in December 2024. The report interprets slightly weathered/fractured to fresh limestone at approximately 2.7 to 4.8 metres below ground level and records zones that indicate increased weathering/fracturing. It states that moderately weathered/fractured rock is marginally rippable to requiring breaking/blasting where it falls within construction depth and that slightly weathered/fractured to fresh rock will require breaking/blasting. For proposed bedrock excavation, it calls for a detailed excavatability assessment combining geophysics, rotary core drilling, strength testing and trial excavation with a high-powered excavator down to formation level. It concludes that the geophysical findings should be reviewed following any further direct investigation.

Conclusion: The applicant's own specialist evidence identifies competent and fractured limestone requiring breaking/blasting within a limited survey area in an elevated blanket-peat landscape beside mapped karst and a karstified conduit aquifer. Although APEX describes the purpose as assessment of one proposed turbine base, the report does not identify a current turbine number or prove correspondence with any final turbine foundation. It therefore cannot be treated as location-specific investigation of a final turbine site. It is not a site-wide assessment and establishes no ground conditions for Saddle Hill, T13, T14, the remaining turbines, hardstandings, roads or borrow pits. Its express requirement for detailed excavatability assessment and later review confirms that geophysics alone was not a final design or environmental determination.

Before consent, the application had to demonstrate: (a) which final turbine and works the survey represents; (b) the exact relationship between the ERT/seismic lines, the corehole and the final foundation and hardstanding; (c) the completed assessment of

excavation and breaking/blasting; (d) vibration and fracture effects on caves, swallow holes, concealed conduits and structures; (e) effects on groundwater movement in the karstified conduit aquifer; (f) effects on peat stability, drainage, runoff and sediment; and (g) whether later direct investigation changed the design or environmental conclusions. Where that complete, location-specific assessment is absent, the breaking/blasting, karst, peat and groundwater consequences remain unresolved at consent stage and support refusal.

13.1 Misleadingly narrow site description and omitted surrounding conditions Appendix H describes the immediate geophysical survey area as an open hillside. That is not an adequate description of the proposed wind-farm site. The wider development area is predominantly commercial forestry, with only limited open ground. The surveyed profile covers one small open area that APEX calls a proposed turbine-base location, but Appendix H does not connect it to any numbered turbine in the final layout. The stated elevation range of 326.4–347.1 mOD applies only to the survey profile. It does not describe the complete development setting. The proposed turbine-foundation locations extend approximately from 165 mOD to 350 mOD, while Dough Mountain rises to approximately 465 mOD above and beside the development. The report does not explain the relationship between the surveyed profile, that full elevation range and the higher peat-covered summit and slopes. The report's maps identify blanket peat, karstified bedrock and a karstified conduit aquifer, but its site description does not record the nearby cave and swallow-hole system or explain the distance and hydraulic relationship between those features, the survey profile and any final turbine foundation. Although breaking/blasting is expressly identified, the report does not assess the exposed sandbank on the ascent towards Dough Mountain where Sand Martins have been observed nesting. It does not examine blasting vibration, excavation, traffic, noise, dust, drainage or slope effects upon that nesting feature. The description does not address the overhanging summit and slope peat, the visible peat faces, exposed soil formation, drainage pathways or existing movement and erosion on Dough Mountain. These are material source and pathway conditions for assessing peat stability, groundwater alteration, runoff, sediment release and downslope consequences. The photograph showing Faughery turbines, open ground and rock exposure provides useful local orientation, but it does not establish the environmental context of the final turbine, foundation and hardstanding or the relationship with the cave, swallow hole, overlying peat and Sand Martin nesting bank.

Conclusion: Appendix H is a narrowly bounded engineering survey of an unnamed location described only as one proposed turbine base. It does not demonstrate correspondence with any turbine in the final 14-turbine layout and therefore cannot be relied upon as investigation of a final turbine foundation. It provides no location-specific assessment of Saddle Hill, T13, T14 or the remaining turbine sites. Its local description must not be presented or relied upon as a description of the wind-farm site. It omits the predominantly commercial-forestry setting, the full foundation-elevation range, the approximately 465 m Dough Mountain summit and overhanging peat slopes, the cave and swallow-hole system, the Sand Martin nesting bank and the complete downslope drainage and stability context. Because the report anticipates breaking/blasting without assessing those receptors and pathways, it does not establish the environmental acceptability of excavation at any final turbine, borrow

pit or associated works location. These omissions had to be resolved before consent and support refusal.

13.2 Breaking/blasting, borrow-pit position and omitted surface-water pathway The omission is particularly serious because Appendix H does not merely record the presence of rock: it concludes that slightly weathered/fractured to fresh rock will require breaking/blasting and that some moderately weathered/fractured rock ranges from marginally rippable to requiring breaking/blasting. The proposed borrow pit lies directly below the exposed cliff or sandbank used by nesting Sand Martins and below overhanging peat on the Dough Mountain slope. This creates a direct spatial relationship between the excavation source, sensitive nesting habitat, unstable or erodible ground above it and downslope receptors. No adequate assessment is identified in Appendix H of vibration, loosening of fractured rock, loss of support, disturbance of the cliff face, peat cracking or displacement, altered groundwater pressure, drainage interception, sediment generation or the combined effect of blasting and borrow-pit excavation. Appendix H contains no adequate description or assessment of the surface-water system at and above the proposed borrow pit. It does not map the springs, drains, seepages, headwater channels and storm-flow pathways capable of carrying peat, soil, blasted fines, suspended sediment or contaminated runoff away from the excavation. Surface water cannot be separated from the recorded blanket peat, fractured limestone and karstified conduit aquifer. Rainfall and intercepted drainage affect peat saturation and stability, while fractures and conduits transmit water beyond the visible excavation boundary.

Conclusion: The report identifies a requirement for breaking/blasting but omits the most important receptors and pathways surrounding the proposed borrow pit: the Sand Martin nesting cliff immediately above it, the overhanging peat and soil formation on Dough Mountain, and the complete surface-water and groundwater drainage system. The application therefore does not demonstrate that excavation and blasting will avoid cliff disturbance, peat movement, drainage alteration, sediment release or pollution of connected waters. These are consent-stage site-suitability and environmental-assessment failures. They cannot be transferred to a contractor or resolved after permission and support refusal.

14. Where the remaining turbine-site evidence is located

No series of equivalent Appendix H geophysical reports has been identified for the fourteen final turbine sites. Appendix H is the only detailed ERT/seismic excavatability report identified and relates to the survey area associated in the Karst Assessment with T7.

Appendix 7-1 — Planning Stage Peat Stability Risk Assessment (May 2026) is the principal document assigning data and risk ratings to the final turbine locations. Its Appendix 1 contains the site-layout and investigation-location plan; its calculation tables are on PDF pages 42–44; and its individual risk-register sheets extend through approximately PDF pages 46–66. For T2, Appendix 7-1 relies on TP42 and TP27 from 2022 and peat probing from 2025; it records peat to 4.5 m and very soft peat in TP42.

For T3, it relies on 2025 peat probing and records 2.1 m peat. These are the principal Saddle Hill records identified, not a turbine-specific borehole/geophysical/blasting report. For T13, Appendix 7-1 cites GA118 and GA119 from 2024, TP07 and GA09–GA13 from 2025. For T14, it cites GA117 from 2024, TP08, TP09, GA16–GA18 and 2025 probes. These are peat/shallow-ground records and stability calculations; they do not constitute equivalent bedrock excavatability, fissure, karst or blasting investigations. Appendix 2-6A — Phase 1 Ground Investigation contains the 2021–2022 exploratory records: two rotary boreholes associated with the met mast and Borrow Pit 2, 36 trial pits, Russian sampling and peat probing. It was undertaken for earlier layouts and does not provide boreholes at every final turbine. Appendix 2-6B — Phase 2 Ground Investigation contains the 2024 trial pits, 39 peat augers, the single T7 rotary borehole and Appendix H geophysics. Appendix 2-6C — Phase 3 Ground Investigation (April 2026) contains the site-location plan in Appendix 1, eight trial pits, 17 hand augers, 97 peat probes and two rotary boreholes. The two rotary boreholes correspond to Borrow Pit 2, not the remaining turbine foundations. One was installed as a groundwater- monitoring well. Appendix 7-2 — Karst Assessment provides the overall chronology and confirms that the APEX geophysics was undertaken at T7 approximately 170 m west of the identified swallow holes. It does not supply equivalent geophysics at Saddle Hill, T13, T14 or every other turbine. EIAR Chapter 7 — Land, Soils, Geology and Hydrogeology, particularly Figure 7-13, is the route map needed to compare every final turbine, borrow pit, road and hardstanding against all exploratory locations.

Conclusion: The application does not contain a complete set of location-specific bedrock and blasting reports for the final turbines. It substitutes a mixture of trial pits, hand augers, peat probes and stability calculations for direct borehole and geophysical investigation at most turbine foundations. Peat-depth evidence cannot determine rockhead, bearing capacity, fractured zones, cavities, groundwater conduits or blasting requirements. The absence of equivalent investigations at Saddle Hill, T13, T14 and the remaining final turbine sites leaves foundation constructability and environmental consequences unresolved before consent.

15. Blasting mechanism affecting T5–T8, T13–T14 and the borrow pits

Appendix H establishes that competent and fractured rock within construction depth requires breaking/blasting at the investigated area. The Phase 1–3 investigations and Appendix 7-1 do not establish the full extent of comparable rock requiring blasting across the final layout. This finding is directly relevant to T5, T6, T7, T8, T13 and T14 and to Borrow Pits 1, 2 and 3 because their construction requires deep excavation, turbine foundations, crane hardstandings, road formation, drainage interception and removal or winning of rock within the same connected upland peat–rock–groundwater environment. Blasting generates ground vibration and changes the fractured rock mass. In this setting, the assessment had to determine effects upon peat support, existing cracks and slip surfaces, cave and swallow-hole stability, fracture permeability, groundwater pressure, springs, surface-water pathways, the Sand Martin nesting cliff and the capacity of borrow-pit faces and containment measures to remain stable. No complete blast design, charge-weight assessment, predicted peak-particle-velocity contours, vibration receptor schedule, peat/slope response assessment or coupled groundwater and surface-water assessment has been identified for those turbines and borrow pits. It would be unsound to assert without that modelling that every site will fail. The decisive planning fact is that the applicant has not demonstrated that blasting and associated excavation will not initiate or materially increase instability at T5–T8, T13–T14 and the borrow pits or transmit effects through the connected rock, peat and water system.

Conclusion: Breaking/blasting is not an isolated construction detail. It is a destabilising mechanism introduced into fractured and karstified rock beneath and beside peat-covered slopes. The applicant has not established the location, magnitude, propagation or consequences of blast vibration across T5, T6, T7, T8, T13, T14 and the three borrow pits. In the absence of a location-specific blast, peat-stability, cave, groundwater and surface-water assessment, the stability of those works and the safety of downslope receptors have not been demonstrated. Permission must be refused rather than allowing the principal ground-risk question to be investigated after consent.

15.1 Site-wide caves, karst and underground-waterway consequences The blasting issue is not confined to the turbine or borrow pit at which rock is broken. The applicant identifies a Regionally Important Aquifer — Karstified (conduit), widespread fractured limestone, caves, swallow holes and numerous possible karst features within the wind-farm setting. In a karst system, the relevant receptors are the connected network of caves, fissures, voids, swallow holes, recharge zones, springs and underground conduits, including features that have not been visibly mapped at the surface. Blast vibration travels through the rock mass. Excavation and blasting also alter fractures, groundwater pressure, permeability, recharge and the movement of sediment and contaminated water. Effects therefore extend beyond an infrastructure footprint and beyond the applicant's red-line or study-area boundary. The demonstrated Polldough underground connection of approximately one kilometre confirms that water entering the ground at one location travels through the subsurface system and emerges elsewhere. It disproves any assumption that effects can be assessed only at the visible cave, swallow hole, turbine or borrow-pit location. No site-wide blast-propagation model, complete conduit model, comprehensive dye-tracing programme or pre- and

post-blast groundwater and spring-monitoring network has been identified for the wind-farm site and its downstream emergence points.

Conclusion: Breaking/blasting creates a site-wide risk to the integrity and functioning of the caves, fractured karst and underground-water system throughout the wind-farm setting; it cannot be assessed as a series of isolated foundation excavations. The applicant has not mapped the complete underground network or demonstrated how vibration, fracture alteration, groundwater redirection, sediment and pollution will behave within it. The EIAR and NIS therefore do not provide the scientific certainty required to exclude significant effects upon connected surface waters, groundwater, caves, springs and downstream protected waters. This site-wide hydrogeological deficiency supports refusal.

15.2 Dye tracing, contaminant travel and the Owenmore River The reported Polldough dye trace demonstrates an underground pathway of approximately one kilometre to Mt Dough Stream. It proves that material entering the subsurface at one location is transported through the karst system and emerges elsewhere. The trace does not, by itself, prove that Polldough is connected to the Owenmore River. It establishes that long subsurface transport occurs locally and that connections to separate receiving waters cannot be excluded by surface topography or planning boundaries alone. Breaking/blasting and borrow-pit excavation generate dust and fine rock particles. Dust deposited on peat, roads, drains and exposed ground is mobilised by rainfall; blast fines and sediment entering fissures, swallow holes, trenches or groundwater are transported through subsurface and surface-water pathways. The EIAR therefore had to identify whether works draining towards the Owenmore catchment create pathways to the Owenmore River and ultimately Lough Gill SAC, including through fractures, roadside drainage, headwater channels, the substation area and connected tributaries. No equivalent dye-tracing or comprehensive groundwater-pathway investigation has been identified demonstrating the fate of water and contaminants from the southern and western works towards the Owenmore/Lough Gill system.

Conclusion: The nearby dye-trace result is direct evidence that pollutants are not confined to their point of entry and that underground transport over substantial distance occurs within the project setting. It makes the absence of equivalent pathway testing towards the Owenmore River and Lough Gill more serious. The applicant has not demonstrated where blasting dust, fine sediment and contaminated runoff deposited or released within the relevant drainage areas will travel. Significant effects upon the Owenmore River, the drinking-water system and Lough Gill SAC have therefore not been excluded, and permission must be refused.

15.3 Direct relevance to the Grid Connection application Appendix H does not prove that blasting is required along every part of the approximately 32 km statutory Grid Connection Route. Its significance to the grid application arises because the wind farm, onsite substation and statutory grid connection form one functionally interdependent project and share connected ground, drainage, groundwater and downstream receptors.

The grid connection begins at the onsite 110 kV substation within the wind-farm setting. Construction includes the substation, cable trenches, joint bays, HDD

crossings, bridge and culvert works and road drainage. Those works create additional disturbed corridors and preferential pathways capable of receiving and transporting sediment, blasting dust, rock fines and contaminated water generated by the wind-farm works. The demonstrated underground dye-trace pathway and the karstified conduit aquifer show that effects originating at turbine or borrow-pit excavations are not confined to the wind-farm planning boundary. The grid EIAR and NIS therefore had to assess the wind-farm blasting and excavation effects cumulatively and in combination with the GCR works. Screening the GCR out of detailed WFD assessment as presenting negligible risk is not reliable where the source–pathway–receptor analysis excludes or inadequately addresses blasting and excavation sources within the connected wind-farm component. The separate planning applications do not divide the hydrology or remove the legal requirement to assess the project as a whole. The grid connection cannot lawfully rely upon EIAR/NIS conclusions derived from a wind-farm ground and hydrogeological assessment that has not resolved blasting, karst and contaminant transport.

Conclusion: The Appendix H blasting finding is material to the grid application because the grid is the enabling, physically connected part of the same project. Wind-farm blasting provides a pollution and ground- disturbance source; the substation, cable trenches, HDDs, joint bays and road drainage provide additional pathways; and the Owenmore/Lough Gill and Lough Melvin systems are sensitive downstream receptors. The applicant has not supplied a coherent whole-project assessment of that combined source–pathway–receptor system. The conclusions of no significant effect and negligible WFD risk cannot be relied upon, and permission for the grid connection must be refused.

15.4 Substation directly downslope of the wind-farm works The onsite 110 kV substation is situated directly below the relevant elevated wind-farm ground and proposed works. It is therefore both grid infrastructure and a downslope receptor of the wind-farm excavation, breaking/blasting, drainage alteration and peat/soil disturbance. Surface water, mobilised sediment and blast-generated dust or rock fines deposited on the upper ground follow gravity-driven drainage towards lower ground. Fractured and karstified bedrock also transmits groundwater independently of the visible surface slope. The substation compound, foundations, drainage, internal cables and the beginning of the statutory GCR create a direct interface between pollution and ground-disturbance sources at the wind farm and the grid connection. The substation's location below the works required assessment of slope runout, sediment loading, altered flows, blocked drainage, groundwater emergence, erosion, foundation stability and contamination reaching the cable corridor. No separate red-line or application boundary removes this physical relationship.

Conclusion: The substation is not merely the electrical starting point of the grid route. It is located directly downslope of the wind-farm works and lies on the physical pathway by which water, sediment, peat and blast-generated material travel from the elevated development ground. This establishes a direct environmental connection between the Appendix H blasting finding and the grid application. The absence of an integrated upslope-source, substation-receptor and downstream-pathway assessment prevents reliance upon the grid EIAR, NIS and WFD

conclusions and supports refusal.

16. Drawing 05773-DR-119a - generic temporary road-reinstatement detail

Drawing 05773-DR-119a, revision P01 dated 21 April 2026, is titled Ducting through Local Roads - Temporary Reinstatement (SD1) with ECC. It is a typical cross-section, not a location plan. It shows a typical longitudinal opening in a dressed rural unbound roadway, approximately 825 mm wide and 1,315 mm deep, containing three 160 mm power ducts, two 125 mm communications ducts and one 125 mm earth-continuity-conductor duct. The drawing contains no coordinate, townland, road number, chainage, crossing reference or schedule identifying where this detail applies. It cannot be treated as the design for the complete 30-36 km route and applies only where the road type and local conditions correspond with the assumed typical section. The note Existing road build-up to be confirmed by Leitrim County Council confirms that the existing construction had not been established in this planning drawing. Alternative materials are also stated to be subject to Road Authority agreement.

The sheet addresses temporary reinstatement and directs the reader to a separate permanent-reinstatement detail. It does not demonstrate the final finished road construction, timing of permanent reinstatement, settlement performance or the complete duration for which each road section remains temporary. It does not identify existing utilities, roadside drains, culverts, water services, rock, groundwater, peat, unstable verges, retaining features, property accesses, joint bays, HDD interfaces or bridge approaches at any actual location. It contains no trench-water management, groundwater cut-off, clay or bentonite plug, pollution barrier, silt- control or cross-drainage detail. The continuous permeable backfilled trench therefore has not been demonstrated to avoid intercepting or conveying water longitudinally. The nominal 825 mm trench is not the complete working width. Saw-cutting, battering or support, plant operation, spoil storage, worker protection, damaged adjoining pavement and reinstatement enlarge the actual construction area. Note 6 expressly requires damage adjacent to the opening to be included within the reinstatement area. The drawing does not establish remaining carriageway width, traffic-light working length, pedestrian provision, property access, emergency access or the location and size of construction compounds along narrow rural roads. It provides no location-specific calculation of excavated material. A nominal 0.825 m by 1.315 m opening is approximately 1.085 cubic metres per linear metre before allowing for wider working space, joint bays, unsuitable material or overbreak. The application must reconcile the route-specific excavation volume with storage, transport, reuse and lawful disposal arrangements.

Conclusion: Drawing 05773-DR-119a is a generic temporary-reinstatement detail, not proof that the cable trench is feasible or environmentally acceptable at each route location. It leaves the existing road structure, final material selection and permanent reinstatement subject to later confirmation and agreement. It supplies no chainage-specific evidence on drainage, utilities, groundwater, rock, traffic, access, spoil or environmental receptors. The public and decision-maker therefore cannot determine where the detail applies, what additional works are required or what the

location-specific effects will be. This unresolved design and environmental information supports refusal rather than post-consent determination.

17. Drawing 05773-DR-119b - generic road trench without ECC

Drawing 05773-DR-119b, revision P01 dated 21 April 2026, is titled Ducting Through Local Roads - Temporary Reinstatement (SD1) and is the No ECC counterpart to Drawing 05773-DR-119a. Both sheets are typical cross-sections for temporary reinstatement of a longitudinal opening in a dressed rural unbound roadway. Neither is a route plan or a location-specific design. The principal difference is that 119a includes a separate 125 mm earth-continuity-conductor (ECC) duct between the two communications ducts. Drawing 119b omits that ECC duct. Omitting the ECC duct reduces the illustrated trench width from approximately 825 mm on 119a to 600 mm on 119b. Both show an overall depth of approximately 1,315 mm, three 160 mm power ducts and two 125 mm communications ducts. The nominal excavation shown by 119b is approximately 0.600 m x 1.315 m = 0.789 cubic metres per linear metre, compared with approximately 1.085 cubic metres per linear metre for 119a, before working space, overbreak, joint bays, unsuitable material or adjacent pavement damage. The choice between the two details therefore changes land disturbance, excavated material, reinstatement width and construction effects. Drawing 119b contains no coordinate, road number, townland, chainage, joint-bay reference or route schedule identifying where the no-ECC arrangement applies. It also contains no cross-reference explaining where Drawing 119a must replace it. The application therefore presents two materially different planning-stage trench designs without a clear public schedule mapping the with-ECC and no-ECC sections along the final route or explaining the engineering criterion governing the choice. The abbreviation ECC is not sufficiently explained for a non-specialist reader. Although the drawing labels it as an earth-continuity-conductor duct, it does not explain the function of the conductor, why it is necessary in some sections, why it is omitted in others, or whether omission changes earthing, fault-current, safety or electromagnetic design. Like 119a, Drawing 119b leaves the existing road build-up to confirmation by Leitrim County Council, makes materials subject to Road Authority agreement and refers permanent reinstatement to another detail. It does not resolve route-specific drainage, groundwater, utilities, traffic, access, spoil or environmental constraints.

Detailed grounds - source page 70

Comparison 119a - With ECC 119b - No ECC Unresolved planning issue

Power ducts 3 x 160 mm 3 x 160 mm Same basic power circuit arrangement shown

Communications ducts 2 x 125 mm 2 x 125 mm Same communications arrangement shown

ECC duct 1 x 125 mm None No route schedule explains where or why ECC is included or omitted

Nominal trench width 825 mm 600 mm Different excavation and reinstatement footprint

Nominal total depth 1,315 mm 1,315 mm Typical depth only; actual local constraints are not identified

Location identifier None None Neither drawing is specific to a named location

Reinstatement Temporary Temporary Final road condition is dealt with elsewhere and is not fixed by these sheets

Conclusion: Drawings 05773-DR-119a and 05773-DR-119b are alternative generic trench details, not location-specific designs. Their materially different widths and duct contents show that the actual works depend upon a choice that has not been transparently mapped to the final route. The application does not tell the public where the ECC duct will be installed, where it will be omitted, why the distinction is technically acceptable, or how the different excavation footprints were carried into environmental, traffic, spoil and reinstatement assessments. The public is not required to infer those matters from specialist abbreviations and disconnected typical details. A clear chainage-based drawing and schedule linking every route section to the applicable detail was required at planning stage. Its absence prevents effective scrutiny and supports refusal.

17.1 Drawing 05773-DR-119c - SD2 temporary reinstatement with ECC Drawing 05773-DR-119c, revision P01 dated 21 April 2026, is titled Ducting Through Local Roads - Temporary Reinstatement (SD2) with ECC. It retains the same nominal cable arrangement and dimensions as 119a: three 160 mm power ducts, two 125 mm communications ducts, one 125 mm ECC duct, approximately 825 mm trench width and 1,315 mm total depth. The difference from 119a is principally the assumed temporary road-surface and upper reinstatement construction. Drawing 119c is based on the Purple Book SD2 detail, shows a surface-dressed temporary surface and gives alternative 75 mm asphalt or 50 mm cold-laid bitmac treatments. It also states that the upper depth varies. Drawing 119a uses the SD1 arrangement and shows a different upper pavement build- up, including the heavily trafficked-road option. Drawing 119c again states that the existing road build-up is to be confirmed by Leitrim County Council and that alternative materials require Road Authority approval. It therefore does not establish that the SD2 assumption corresponds with the construction of any identified road section. No road number, townland, coordinate, chainage, pavement survey, traffic class or route schedule is provided on the sheet. It does not identify where SD2 applies, where SD1 applies, or where road conditions require another detail. A member of the public cannot determine the distinction between SD1 and SD2 from the drawing titles alone. The application does not provide, on this sheet, a plain-language explanation of the roadway categories or the evidence used to assign each part of the route to one category. The same unresolved drainage, groundwater, utilities, working-width, traffic, access, spoil and permanent-reinstatement issues recorded for 119a and 119b apply to 119c.

Comparison 119a - SD1 with ECC 119c - SD2 with ECC Unresolved planning issue

Duct arrangement 3 power, 2 communications, 1 ECC 3 power, 2 communications, 1 ECC Same cable arrangement

Nominal trench 825 mm wide; 1,315 mm deep 825 mm wide; 1,315 mm deep Actual site depth and working width remain unidentified

Temporary surface SD1 pavement treatment SD2 surface-dressed/alternative asphalt treatment

No chainage schedule assigns SD1 or SD2 to actual road sections

Detailed grounds - source page 67

demonstrated route-wide pavement survey

Location-specific No No Neither sheet establishes feasibility at a named location

Conclusion: Drawing 05773-DR-119c introduces a further generic reinstatement option but does not identify any location at which it will be used. The existence of separate SD1 and SD2 details confirms that road construction and reinstatement vary along the route. The application does not provide the chainage-based pavement classification, survey evidence or cross-reference necessary to show which design applies to each road section. Consequently, the public cannot identify the works, excavation, materials, traffic effects and final reinstatement proposed outside their properties or at sensitive route locations. This information was required at planning stage and should not be selected later through agreement between the contractor and Road Authority.

17.2 Drawing 05773-DR-119d - SD2 temporary reinstatement without ECC Drawing 05773-DR-119d, revision P01 dated 21 April 2026, completes the four public-road variants. It is the SD2 counterpart to 119b and omits the ECC duct. It shows three 160 mm power ducts and two 125 mm communications ducts in a nominal trench approximately 600 mm wide and 1,315 mm deep. Its temporary upper reinstatement follows the SD2 arrangement shown on 119c, but the omission of the ECC duct reduces the trench width from 825 mm to 600 mm. It is not tied to any named road, townland, coordinate, chainage, property, crossing or identified ground condition. The sheet does not explain where or why this SD2/no-ECC combination applies. Like the other three sheets, it leaves the existing road build-up to confirmation by Leitrim County Council and the selection of some materials to later Road Authority agreement.

17.3 Overall finding on the four public-road ducting drawings The four drawings form a two-by-two set of generic options:

Road-reinstatement category With ECC Without ECC

SD1 119a - 825 mm trench 119b - 600 mm trench

SD2 119c - 825 mm trench 119d - 600 mm trench

As standard construction details, this type of drawing is normal: it specifies duct diameters, separation, warning tapes, surround/backfill, compaction and temporary road reinstatement by reference to the national Purple Book. The details could be reused for a qualifying road opening in many parts of Ireland. That is precisely why

they do not establish the suitability or impacts of the Lissinagroagh route. They describe how a typical trench might be constructed after the applicable option and location have been selected, not whether that option is feasible and environmentally acceptable at a particular place. Soil and roadside conditions vary materially. The drawings do not address peat, soft ground, rock excavation, high groundwater, springs, karst, contaminated ground, unstable verges, retaining walls, tree roots, roadside banks, buried services, field drains, road drainage, culverts, watercourses, bridge approaches or constrained residential frontages. A trench backfilled with granular and cement-bound material has a different permeability and stiffness from many surrounding soils. Without location-specific design, it intercepts shallow groundwater or drainage and acts as a longitudinal preferential pathway, while impermeable plugs or other controls can instead impound or redirect water. The drawings provide no route-specific hydraulic assessment or schedule of cut-offs, plugs, cross-drains, sumps, pumping, discharge points and pollution controls. The 600 mm and 825 mm dimensions describe the finished nominal trench, not the total construction footprint. Saw cuts, trench support or battered sides, plant, spoil, worker access, dewatering, utility exposure and repair of adjacent damaged pavement enlarge the disturbed area. The drawings show temporary reinstatement. They do not establish the final surface, settlement period, performance standard, inspection programme, liability for later failure or the timing and extent of permanent reinstatement at each route section.

A later road-opening licence regulates execution in the public road. It does not replace the consent-stage requirement to describe and assess the development, its likely significant effects and the route-specific mitigation on which environmental acceptability depends. The public should have been given a single intelligible route schedule showing, at minimum, chainage, road number/townland, SD1 or SD2, ECC or no ECC, existing pavement and verge, soil/rock/peat and groundwater conditions, utilities and drainage, trench depth and working width, joint bays and chambers, crossings, traffic arrangement, excavated volume, storage/disposal destination, environmental receptors and the applicable mitigation drawing.

Conclusion: The four sheets are credible as generic workmanship details but inadequate as evidence of the works proposed along this particular 30-36 km route. They present four selectable combinations without identifying where each applies or explaining the site evidence and engineering criteria governing selection. Because they omit the relationship between the trench and actual soil, rock, groundwater, drainage, utilities, properties and ecological receptors, they do not enable the public or decision-maker to understand the location-specific development and effects. Those matters have been deferred from the planning application to later confirmation, contractor design and Road Authority agreement. That is a material consent-stage deficiency and supports refusal.

17.4 Drawing 05773-DR-120a - SD4 permanent reinstatement with ECC Drawing 05773-DR-120a, revision P01 dated 21 April 2026, is titled Ducting Through Local Roads - Permanent Reinstatement (SD4) With ECC. Unlike drawings 119a-119d, this sheet shows a permanent longitudinal-road reinstatement detail. It retains the with-ECC duct arrangement and nominal dimensions: three 160 mm power ducts, two

125 mm communications ducts, one 125 mm ECC duct, an approximately 825 mm trench and 1,315 mm total depth. The permanent surface is more substantial than the temporary SD1/SD2 arrangements. It specifies alternative SMA, HRA or asphalt-concrete surface courses matching the adjoining road or as directed by the Road Authority, bituminous layers, sealed joints and a skid-resistance requirement. This is still a generic standard section. It has no road number, townland, coordinate, chainage, traffic classification, pavement-core result or schedule identifying the sections at which SD4 will apply. The sheet again states that the existing road build-up is to be confirmed by Leitrim County Council and allows surface materials to be selected or directed later by the Road Authority. It therefore does not establish the final location-specific pavement design at planning stage. Note 9 introduces an additional later choice for roads without an asphalt-concrete surface: the Road Authority may permit asphalt regulation followed by surface dressing instead of excavation and reinstatement. That alternative is not mapped to any route section. Note 12 appears internally inconsistent. Although the sheet is itself titled and labelled as a permanent reinstatement detail, Note 12 instructs the reader to refer to a permanent-reinstatement detail and says permanent reinstatement will occur after adequate settlement. This appears to be residual wording copied from the temporary sheets and creates uncertainty about whether the sheet is the final detail or whether another drawing governs. The 100 mm lateral dimension shown beyond the trench edge at surface level and the requirement to reinstate damage adjacent to the opening confirm that the finished reinstatement footprint exceeds the nominal 825 mm duct trench. The actual width can be greater where adjoining pavement is damaged or where the Road Authority requires wider treatment. The drawing addresses pavement workmanship only. It does not resolve route-specific soil, peat, rock, groundwater, drainage, utilities, bridge approaches, roadside stability, traffic management, spoil or ecological constraints.

Conclusion: Drawing 05773-DR-120a provides a credible generic permanent pavement- reinstatement section but does not identify where it applies or establish the final design for any road section. Material choices, the existing pavement structure and an additional surface-dressing alternative remain subject to later confirmation or Road Authority direction. The apparent copied temporary-reinstatement wording in Note 12 further undermines clarity. A chainage-based schedule was required to connect each road section to the applicable temporary and permanent details and to the actual pavement, ground, drainage, traffic and environmental conditions. Without it, the public cannot determine the final works proposed at any identifiable location.

17.5 Drawing 05773-DR-120b - SD4 permanent reinstatement without ECC Drawing 05773-DR-120b, revision P01 dated 21 April 2026, is the no-ECC counterpart to 120a. It shows permanent SD4 reinstatement around three 160 mm power ducts and two 125 mm communications ducts in a nominal trench approximately 600 mm wide and 1,315 mm deep. Its principal physical difference from 120a is removal of the 125 mm ECC duct and reduction of the nominal trench width from 825 mm to 600 mm. The permanent pavement alternatives and notes otherwise substantially repeat 120a. No route location, road number, townland, coordinate, chainage, traffic classification or pavement investigation identifies where this no-ECC permanent detail applies or where

it changes to the with-ECC detail. The same later choices remain: the existing road build-up is to be confirmed by Leitrim County Council; surface material is to match the existing road or be directed by the Road Authority; other bound materials require agreement; and a separate treatment may be permitted for surface-dressed roads. The permanent sheet retains several references to temporary reinstatement. Note 6 requires the licence holder to maintain temporary reinstatement; Note 9 discusses regulation of the temporary reinstatement surface; and Note 12 directs the reader to a permanent-reinstatement detail even though this is already that purported detail. These statements appear to have been copied from temporary sheets without being reconciled with the drawing title and purpose. These inconsistencies do not necessarily make the physical section unbuildable. They do mean the planning document is not a clear, self-contained statement of the proposed permanent works and the sequence from temporary to permanent reinstatement. As with the other road sections, pavement detail does not resolve soil, peat, rock, groundwater, drainage, utilities, working area, traffic, spoil or environmental receptors at any actual location.

Conclusion: Drawing 05773-DR-120b completes the permanent SD4 pair but confirms the unresolved choice between 600 mm no-ECC and 825 mm with-ECC construction. Neither option is mapped to the final route. The repeated temporary-reinstatement wording within drawings labelled permanent creates an avoidable internal inconsistency and leaves the final construction sequence unclear. The application therefore supplies standard component details without the route schedule, site evidence and plain-language cross- referencing required to establish what will be built at each location and how its effects were assessed.

17.6 Drawing 05773-DR-120c - SD5 permanent reinstatement with ECC Drawing 05773-DR-120c, revision P01 dated 21 April 2026, is titled Ducting Through Local Roads - Permanent Reinstatement (SD5) With ECC. It retains the with-ECC duct configuration and nominal 825 mm by 1,315 mm trench shown in 119a, 119c and 120a. The principal difference from SD4 is the upper permanent road treatment. SD5 shows a surface-dressed road over a 75 mm AC20 dense binder course, or the existing depth where greater, rather than the range of SMA/HRA/asphalt surface courses shown on SD4. SD5 also illustrates 200 mm surface extensions beyond the trench edges, compared with 100 mm shown on SD4. This confirms that the permanent reinstatement footprint changes with the selected standard and extends beyond the nominal duct trench. The sheet contains no road number, townland, coordinate, chainage, existing-surface survey or route schedule showing which road sections qualify for SD5 and where SD5 changes to SD4. The existing road build-up remains expressly unconfirmed and subject to Leitrim County Council confirmation. Backfill and surface choices remain subject to Road Authority agreement or direction. The same copied or conflicting wording appears as on 120a and 120b: Note 6 concerns maintenance of temporary reinstatement; Note 9 discusses a temporary reinstatement surface; and Note 12 directs the reader to a permanent detail although the sheet is already presented as the permanent detail. The sheet does not address the route-specific soil, peat, rock, groundwater, drainage, utilities, roadside stability, working area, spoil, traffic or ecological setting beneath and beside the pavement.

Conclusion: Drawing 05773-DR-120c adds another permanent construction category and a different reinstatement footprint without identifying where it applies. The route now includes alternative temporary standards, alternative permanent standards and with-ECC/no-ECC configurations, but no intelligible chainage-based matrix connects those options to actual roads and environmental conditions. The repeated temporary wording in a permanent drawing also leaves the sequence and final specification unclear. The application therefore does not provide the public with a definite, location-specific description of the proposed works.

17.7 Drawing 05773-DR-120d - SD5 permanent reinstatement without ECC Drawing 05773-DR-120d, revision P01 dated 21 April 2026, is the no-ECC counterpart to 120c. It shows three 160 mm power ducts and two 125 mm communications ducts in a nominal trench approximately 600 mm wide and 1,315 mm deep. The separate 125 mm ECC duct shown on 120c is omitted. The upper permanent reinstatement is the SD5 surface-dressed arrangement: surface dressing over a 75 mm AC20 dense binder course, or the existing depth where greater, with approximately 200 mm surface extensions beyond each trench edge. It contains no road number, townland, coordinate, chainage, pavement survey or location schedule showing where the SD5/no-ECC combination applies. The existing road build-up remains to be confirmed by Leitrim County Council and material or surface choices remain subject to later Road Authority agreement or direction. It repeats the same temporary-reinstatement language within a drawing labelled permanent, including Notes 6, 9 and 12.

The public-road drawing set examined can therefore be summarised as follows:

Drawing	Stage	Road standard	ECC	Nominal trench
119a	Temporary	SD1	Yes	825 x 1,315 mm
119b	Temporary	SD1	No	600 x 1,315 mm
119c	Temporary	SD2	Yes	825 x 1,315 mm
119d	Temporary	SD2	No	600 x 1,315 mm
120a	Permanent	SD4	Yes	825 x 1,315 mm

Drawing	Stage	Road standard	ECC	Nominal trench
120b	Permanent	SD4	No	600 x 1,315 mm
120c	Permanent	SD5	Yes	825 x 1,315 mm
120d	Permanent	SD5	No	600 x 1,315 mm

Conclusion: Drawing 05773-DR-120d completes an eight-sheet matrix of public-road options. The drawings classify alternative temporary and permanent pavement treatments and with-ECC/no-ECC duct arrangements, but they do not classify or design for the underlying peat, soil, rock, karst, groundwater or drainage conditions. None identifies where it applies. The application consequently supplies a

catalogue of standard road details rather than a route-specific construction design. It leaves the selection of the actual option and the response to ground conditions until later confirmation and agreement, preventing effective consent- stage assessment and public scrutiny.

18. Drawing 05773-DR-121a - access-track ducting with ECC

Drawing 05773-DR-121a, revision P01 dated 21 April 2026, is titled Ducting Through Access Track - With ECC Duct. It shows the same nominal with-ECC duct arrangement used in the road drawings: three 160 mm power ducts, two 125 mm communications ducts and one 125 mm ECC duct in an approximately 825 mm by 1,315 mm trench. The surface treatment changes from public-road asphalt/reinstatement to a generic access track reinstated with compacted Clause 804 material and screenings. The access-track width itself is not dimensioned; it is stated to be as per track design, requiring another design to establish the total footprint. The drawing is expressly generic and provisional. Note 1 states that it is subject to EirGrid and ESB approval and is to be used for planning purposes only. Note 2 states that the customer is to submit planning designs and proposed cable routes to EirGrid for review and acceptance in advance of submission to the local authority. The application should therefore demonstrate whether that review and acceptance occurred and identify the accepted version. The drawing itself does not record EirGrid or ESB acceptance. Note 3 states that high-voltage cable installation across third-party lands is to be avoided where possible. Note 6 nevertheless requires a deed of easement and a minimum 4 m easement width for a 110 kV circuit. The application does not identify on this sheet the affected third-party parcels, the confirmed easement corridor or whether access for construction, inspection, emergency response and repair has been secured.

Note 4 states that high-voltage cable installation across peatlands is undesirable and permitted only in exceptional circumstances. This is a significant design constraint. The application must identify every peatland section, explain the exceptional justification, provide peat-depth and stability evidence, and show the modified construction, drainage, access and restoration design. The generic drawing contains none of that information. Note 5 requires service roads along all non-public-road sections of the cable route and suitable safe access for maintenance and cable-pulling vehicles at all joint bays. The environmental and land-take footprint is therefore not limited to the 825 mm trench. It includes an access/service road, at least a 4 m easement corridor, joint-bay vehicle access and construction working space. The drawing does not dimension the service road, specify its foundation, drainage, passing/turning areas or reinstatement, or identify its route. It therefore does not quantify the full excavation, imported stone, vegetation removal, drainage alteration, spoil and habitat loss associated with off-road cable construction. The generic compacted backfill detail does not distinguish mineral soil, peat, saturated ground, rock, karst or high groundwater. It provides no trench plugs, cross-drainage, dewatering, discharge or pollution-control details responding to actual local conditions. The title block contains the typographical wording Lissinagroagh Wind Fram. This is minor by itself, but the substantive issue is that the sheet remains provisional and unconnected to a route-specific access-track and ground-condition schedule.

Conclusion: Drawing 05773-DR-121a is more significant than a simple duct section. Its own notes confirm that peatland installation is undesirable and exceptional, third-party installation should be avoided, a minimum 4 m easement is required, and service roads must be provided along every non-public-road section and at joint bays. Those requirements create land-take, access, drainage, peat-stability and ecological effects far beyond the nominal 825 mm trench. The drawing is expressly for planning purposes only and subject to EirGrid and ESB approval, yet it does not identify the accepted design, peatland sections, exceptional justification, easement parcels or service-road footprint. The application has therefore not defined or assessed the complete off-road development before consent.

18.1 Drawing 05773-DR-121b - access-track ducting without ECC Drawing 05773-DR-121b, revision P01 dated 21 April 2026, is the no-ECC counterpart to 121a. It shows three 160 mm power ducts and two 125 mm communications ducts in a nominal 600 mm by 1,315 mm trench beneath an access track. Removal of the separate 125 mm ECC duct reduces the nominal trench width from 825 mm to 600 mm. All material qualifications concerning land and access remain unchanged. The drawing remains subject to EirGrid and ESB approval and is stated to be for planning purposes only. It repeats the requirement for pre-submission EirGrid review and acceptance. It repeats that third-party-land crossings should be avoided, peatland installation is undesirable and exceptional, service roads are required along non-public-road sections and at joint bays, and a minimum 4 m easement is required for the 110 kV circuit. The title block describes the sheet only as Ducting Through Access Track and does not expressly state No ECC, although that distinction appears in the PDF filename/metadata and is apparent from the section. A non-specialist should not be required to deduce a material electrical and excavation distinction by comparing duct counts across drawings. No route schedule identifies where 121a or 121b applies, why ECC is present or absent, where peat or third- party land is crossed, or the full service-road and easement footprint.

Access-track issue	121a	121b
ECC duct	Included	Omitted
Nominal trench width	825 mm	600 mm
Peat crossing	Undesirable / exceptional	Undesirable / exceptional
Easement	Minimum 4 m	Minimum 4 m
Service road	Required	Required
Approval status	Subject to EirGrid / ESB approval	Subject to EirGrid / ESB approval

Unresolved matters in the access-track drawing pair

ECC duct: No route-specific assignment identified.
Trench width: Different excavation widths require route identification.
Peat: Locations and exceptional justification not identified.
Easement: Affected parcels not identified on this sheet.
Service road: Width, alignment and drainage not shown.
Approval: Accepted design not identified on this sheet.

Conclusion: The access-track pair confirms that removal of the ECC duct changes only the nominal trench width; it does not resolve the much larger off-road footprint or environmental constraints. Both drawings acknowledge exceptional peatland circumstances, third-party land, a minimum 4 m easement and mandatory service-road access, while leaving their locations and designs unidentified. The lack of route-specific assignment means the public cannot determine whether an 825 mm or 600 mm trench, peat crossing, service road or easement affects any identifiable parcel or receptor. This is not a minor construction choice; it changes excavation, land take, drainage and environmental effects and had to be defined before consent.

19. Drawing 05773-DR-122a - off-road/grassland ducting with ECC

Drawing 05773-DR-122a, revision P01 dated 21 April 2026, is titled Ducting Through Off Road / Grassland Section with ECC. It shows the standard with-ECC arrangement in a nominal 825 mm by 1,315 mm trench. The drawing changes only the surface presentation. Instead of a road or access-track construction, it shows ground level and states that a layer of backfill is to be reinstated according to the existing wearing composition. It does not define topsoil depth, soil horizons, subsoil handling, agricultural drainage, compaction limits, cultivation, reseeding or restoration performance. The term wearing composition is ordinarily associated with a trafficked surface and is unclear when applied to grassland. The drawing does not explain whether it means topsoil, turf, vegetation, agricultural soil or another finish. The trench below that surface remains filled with compacted granular material and cement-bound granular material. The drawing does not assess the hydraulic and agricultural consequences of inserting this rigid, permeable linear structure into natural soil. It provides no route-specific provisions for field drains, springs, shallow groundwater, wet grassland, saturated soils, peat, erosion, livestock access, boundary removal, biosecurity, crop loss or reinstatement of soil productivity. The notes repeat that the design is for planning purposes only and subject to EirGrid and ESB approval; third-party crossings should be avoided; peatland installation is undesirable and exceptional; a minimum 4 m easement is required; and service roads must be installed along non-public-road sections and at joint bays. Calling the section grassland therefore does not mean only an 825 mm strip will be disturbed and restored. The complete footprint includes the easement, service road, working strip, separated soil storage, plant movement, joint-bay access and drainage works. No parcel, townland, coordinate, chainage, grassland type, soil survey, drainage survey or landowner-specific reinstatement requirement identifies where the detail applies.

Conclusion: Drawing 05773-DR-122a is not a location-specific soil or agricultural-restoration design. It places the standard duct trench beneath an undefined reinstated surface while leaving soil classification, horizons, drainage, groundwater, compaction, service-road construction and restoration to later determination. Its own notes expand the off-road footprint to a minimum 4 m easement and service-road access and recognise peat crossing as exceptional. The application has not identified the affected parcels or demonstrated how the grassland, soil, drainage and agricultural functions will be restored. The public therefore cannot understand or assess the actual off-road works and effects before consent.

19.1 Drawing 05773-DR-122b - contradictory grassland/no-ECC detail The filename identifies Drawing 05773-DR-122b as Ducting Through Grassland - No ECC, and the section itself contains only three 160 mm power ducts and two 125 mm communications ducts in a nominal 600 mm by 1,315 mm trench. No separate ECC duct is drawn. The drawing nevertheless contains direct contradictory labelling. Its PDF title/metadata states Off Road With ECC, and the caption beneath the section states 110kV Ducting through Grassland, (with ECC duct). The sheet title merely says Grassland Section and does not resolve the conflict. The P01 planning issue in the revision table is dated 21.04.06, whereas the PDF creation date is 21 April 2026 and the related drawings use 21.04.26. The P00 line is dated 12.01.26. The P01 date therefore appears to be a material typographical error of twenty years. These are not merely cosmetic where two otherwise similar variants differ specifically by whether an ECC duct is included. The sheet simultaneously presents a 600 mm no-ECC physical section and written descriptions stating with-ECC. The approved electrical arrangement, trench width, excavation quantity and applicable detail cannot be determined reliably from the face of the planning drawing.

Apart from the missing ECC duct and narrower trench, the sheet repeats 122a. It provides no soil-horizon, agricultural-drainage, groundwater, field-drain, topsoil, compaction, restoration or route-specific information. It repeats the provisional approval, third-party-land, exceptional peatland, service-road and minimum 4 m easement notes without identifying the affected parcels or locations.

Conclusion: Drawing 05773-DR-122b contains an internal contradiction on the defining feature of the design. The physical section and filename indicate no ECC, while the PDF metadata and drawing caption state with ECC. Its P01 issue date also appears wrong by twenty years. Because the ECC distinction changes the trench from 600 mm to 825 mm and affects electrical, excavation and environmental design, the public and decision-maker cannot safely infer which version was intended. The contradiction requires correction and republication together with a route schedule; it reinforces that the lodged drawing set is not a definite, internally verified description of the proposed development.

20. Drawing 05773-DR-123 - ducting through a forestry road

Drawing 05773-DR-123, revision P01 dated 21 April 2026, shows a nominal 825 mm by 1,315 mm trench beneath a finished forestry-road level. It includes three 160 mm power ducts, two 125 mm communications ducts and one 125 mm ECC duct. Unlike the access-track and grassland drawings, this sheet contains no alternative no-ECC version within the material reviewed to date. The application must identify whether ECC is required throughout the forestry section and reconcile that with the with-ECC/no-ECC choices elsewhere. The surface is shown only as compacted Clause 804 material finished with screenings. No forestry-road width, crossfall, camber, verge, ditch, culvert, formation level, pavement thickness or existing road construction is dimensioned. The drawing requires selected backfill with a maximum 75 mm grain size, compacted in 150 mm layers to avoid residual consolidation and improve thermal properties. It also states that full tests are required for the cement-bound granular material but does not identify the test programme, acceptance criteria, locations or reporting arrangements in this sheet. The section does not address the conditions that determine whether an existing forestry road can receive a 1.315 m-deep trench: road formation over peat or soft ground, existing settlement, load-bearing capacity, shallow rock, high groundwater, springs, longitudinal and cross-drainage, tree roots, roadside ditches, culverts, slope stability or storm-damaged ground. It does not show how existing forestry drainage crossing the road will be maintained or how the granular trench will be prevented from intercepting and conveying water along the road corridor. It contains no chainage, turbine/borrow-pit/substation reference, road identifier, coordinate or schedule connecting it to an identifiable forestry-road section. It cannot demonstrate suitability at the storm-damaged ground or other sensitive forestry locations without that link. Reinstatement is stated to comply with landowner requirements, but the drawing does not define those requirements or demonstrate that they include environmental, drainage, stability and long-term road- performance standards.

Conclusion: Drawing 05773-DR-123 is a generic duct arrangement beneath an undefined forestry- road surface. It provides no location-specific evidence that the existing road formation, peat or soil, drainage, groundwater, culverts, roots and slopes can accommodate the excavation and reinstatement. It also leaves material testing and landowner requirements undefined and supplies no route schedule identifying where it applies. In a forestry upland where roads and drains control water movement and where storm damage and peat conditions are material, this standard section does not constitute a complete construction or environmental design.

21. Drawing 05773-DR-124 - ducting in flat formation

Drawing 05773-DR-124, revision P02 dated 21 April 2026, shows flat formation. In this context, flat refers to the ducts being arranged side-by-side in one horizontal row; it does not mean that the route or surrounding ground is flat. The arrangement is materially wider than the earlier grouped duct sections. It shows a nominal concrete-encased formation approximately 1,655 mm wide containing three 160 mm power ducts, two 125 mm communications ducts and one 125 mm ECC duct. The detail provides a minimum 450 mm clearance from the road surface to the top of the highest cable duct where the trench is in the carriageway. It states that heavy-duty galvanised steel plates, red marker strips and A393 reinforcement mesh are to be installed until standard cover is achieved.

The detail therefore appears intended for constrained locations where the normal deeper grouped formation or standard cover cannot be achieved. Such constraints arise from shallow utilities, structures, culverts, bridge decks, bedrock or other obstructions, but the drawing identifies no actual reason or location for using it. The wider formation substantially changes excavation width, concrete quantity, spoil volume, road occupation, traffic management and interaction with utilities and drainage. A 1.655 m formation also requires a greater working width beyond the concrete envelope. No chainage, road, crossing, bridge, culvert, obstruction, coordinate or schedule identifies where flat formation will replace the 600 mm or 825 mm standard sections. The public therefore cannot know where a trench more than twice the width of the narrower standard detail is proposed. The drawing refers road reinstatement generally to the Purple Book but does not show a complete temporary or permanent pavement build-up for this wider section. Nor does it address dewatering, groundwater, cross-drainage, concrete washout, curing, utility support, settlement at the concrete/granular interface or disposal of the materially increased excavation. Revision P02 followed P01 by one day, but the revision table gives no description of what changed between the two planning issues. The public cannot identify whether a material dimension or construction requirement was altered.

Conclusion: Drawing 05773-DR-124 is not a general description of level-ground construction. It is a special, approximately 1.655 m-wide side-by-side duct formation associated with reduced cover or constrained conditions. It materially increases excavation, concrete, spoil, road occupation and construction effects. The application does not identify any location where it applies, the obstruction requiring it, or how its additional effects were assessed. Without a chainage-based schedule connecting this special detail to the final route, the development description and environmental assessment remain incomplete.

22. Drawing 05773-DR-125 - ducting through off-road sections

Drawing 05773-DR-125, revision P02 dated 21 April 2026, shows an off-road section based on Purple Book detail SD14. It contains the with-ECC arrangement in a nominal 825 mm by 1,315 mm trench. The surface is labelled excavated topsoil, which is clearer than the undefined existing wearing composition used on Drawing 122a. However, no topsoil thickness, turf depth, soil horizon, stripping width, storage arrangement, compaction limit, reinstatement method or restoration standard is specified. The drawing shows compacted Clause 804 backfill beneath the replaced topsoil and cement-bound granular material around the ducts. It does not assess how this linear granular/concrete structure changes agricultural drainage, shallow groundwater, soil moisture, settlement, cultivation or vegetation recovery. No trench plugs, field-drain crossings, cross-drainage, dewatering, discharge points, erosion controls or measures for springs, wet grassland, peat or saturated soils are shown. The sheet overlaps substantially with Drawing 122a, which is also titled off-road/grassland with ECC, but the two drawings contain different notes and surface descriptions. Drawing 122a contains the EirGrid/ESB approval, third-party land, exceptional peatland, service-road and minimum 4 m easement requirements; Drawing 125 omits them. The application does not explain which off-road conditions use 122a and which use 125, or whether the omitted requirements still apply. Only the with-ECC formation is shown on this sheet. No no-ECC counterpart or rule governing ECC selection is identified for the SD14 off-road section. It contains no field, parcel, townland, coordinate, chainage, soil survey or route schedule. Landowner requirements are invoked but not defined. P01 and P02 were issued on consecutive days, but the revision table does not describe what changed. The public cannot determine whether the topsoil, width, material or another substantive requirement was revised.

Conclusion: Drawing 05773-DR-125 adds a second generic off-road/grassland construction detail without explaining its relationship to Drawing 122a. The two sheets use different surface wording and materially different notes, including omission from Drawing 125 of the peatland, service-road, easement and approval qualifications stated on Drawing 122a. No route schedule identifies where either detail applies. The application therefore does not provide one coherent off-road design or demonstrate how soil, field drainage, groundwater, peat and agricultural restoration will be protected at identifiable locations.

23. Drawing 05773-DR-126 - culvert/service undercrossing

Drawing 05773-DR-126, revision P02 dated 21 April 2026, is a generic undercrossing detail for an existing culvert or utility service. It does not identify a particular culvert, watercourse, road or chainage.

The ducts splay from the standard formation into a single horizontal row to pass beneath the existing culvert/service. The illustrated formation is approximately 1,530 mm wide with ECC and approximately 1,330 mm without ECC. The transition uses 1:6 gradients and therefore extends longitudinally beyond the crossing itself. The existing culvert/service is to be supported during the crossing. Rapid-hardening C25/30 concrete is placed between it and the ducting, with steel protection plates and marker strips extending one metre either side. This is substantial excavation and temporary

support directly beneath existing infrastructure. General Note 1 states that the drawing is subject to design approval and is not to be used for construction. It therefore does not represent an approved final crossing design. Note 5 prohibits excavation until the contractor has consulted current service drawings and completed an electromagnetic-locator scan. This confirms that the exact buried-service conditions were not resolved by the generic planning detail. Note 7 leaves the decision to substitute rapid-hardening concrete where compaction could damage the culvert/service to later engineer approval. Note 9 requires consultation with the cable-system design engineer where duct depth exceeds 2,500 mm. These are material design decisions deferred until actual conditions are encountered. Note 13 transfers design and construction of all temporary works to the contractor, including appointment of a temporary-works designer and later submission to the PSDP. The stability and support method for an existing culvert are therefore not provided at consent stage. Note 16 requires consultation with the owner of the crossed utility only before works commence. The sheet does not record prior owner agreement, asset condition, allowable loading, shutdown requirements or the approved crossing method. Note 17 requires photographic and as-built evidence after construction.
Post-construction evidence does not replace pre-consent identification and assessment of the culvert, watercourse, ground conditions and construction risks. Although the title includes culverts, the drawing contains no water-management or ecological method for a live drainage or watercourse structure: no flow isolation or bypass, pumping arrangement, flood contingency, sediment control, concrete-water containment, fish or aquatic timing restriction, culvert-condition survey or emergency response. Excavating beneath a culvert changes the immediate support and groundwater environment and creates a direct pollution pathway to the water it carries. The generic detail does not distinguish a dry roadside pipe from a continuously flowing, ecologically connected watercourse culvert. P01 and P02 were issued on consecutive days, but no revision description identifies the change.

Conclusion: Drawing 05773-DR-126 confirms that each culvert undercrossing requires wide duct splaying, excavation beneath an existing asset, temporary support, concrete placement and location-dependent engineering decisions. Yet the sheet is expressly unapproved for construction, assigns temporary works to a future contractor and does not identify which culverts it governs or how live flows and aquatic receptors will be protected. A route schedule and crossing-specific design were required for every culvert, including asset condition, hydrology, ecology, ground conditions, clearances, temporary works, water management and emergency measures. The generic drawing does not provide that consent-stage evidence.

23.1 Drawing 05773-DR-127 - culvert/service overcrossing Drawing 127 provides the alternative of taking the cable ducts above an existing culvert or service. The ducts splay into a horizontal formation approximately 1,530 mm wide with ECC and approximately 1,330 mm without ECC, with steel plates, reinforcement and rapid-hardening concrete until normal cover is restored. ESB's stated preference remains to cross below existing services where possible, yet no schedule identifies the locations where overcrossing is required or the obstruction preventing undercrossing. The sheet is subject to design approval and not for construction. Existing services, depths and temporary works remain for later contractor investigation and design. For a

culvert, placing the duct bank above it changes cover, loading and access for future culvert inspection or replacement. No culvert capacity, structural-condition, hydraulic, blockage, flood, ecological or future- maintenance assessment is provided.

23.2 Drawing 05773-DR-128 - watermain/wastewater undercrossing Drawing 128 adapts the generic undercrossing to an existing watermain or wastewater pipe. It requires later service drawings and scanning, temporary works by the contractor, owner consultation before works and before-and-after camera scoping.

It states that damaged watermains will be replaced in full. That is a response after damage, not evidence that drinking-water or wastewater service interruption, leakage, contamination, emergency supply and pollution consequences were assessed at each crossing. No identified watermain, wastewater pipe, diameter, material, age, pressure, condition, customer population, isolation point or emergency arrangement is provided on the sheet.

23.3 Drawing 05773-DR-129 - watermain/wastewater overcrossing Drawing 129 provides the alternative overcrossing arrangement and repeats the provisional approval, scanning, contractor temporary-works, owner consultation, camera survey and damage-replacement provisions. No location schedule explains where overcrossing rather than the preferred undercrossing will occur or why the available cover and separation are acceptable. The drawing does not assess future access to the water/wastewater asset, differential settlement, leakage detection, repair constraints or contamination and service-continuity consequences at any named location.

23.4 What the drawing index confirms The lodged drawing index confirms that Drawings 119A-129 are the complete indexed series of generic ducting, road, off-road, culvert/service and watermain/wastewater details. They are not the complete route design. The index separately lists 17 site-layout plans (05773-U-DR-101 to 117), communications/transition chambers, joint-bay and link-box details (142-146 and 148), and eleven individual bridge/crossing sheets (152-162, mostly HDD). The standard details explain possible construction forms. The site-layout sheets should identify where route features occur; the chamber and joint-bay sheets define larger permanent structures; and the bridge/HDD sheets address named crossings. A complete public understanding requires those groups to be cross- referenced by chainage and location. The index itself does not provide a schedule assigning each length of route to SD1, SD2, SD4, SD5, access- track, grassland, forestry-road, SD14, flat formation, with-ECC/no-ECC, culvert over/under or watermain over/under construction.

Conclusion: The drawings uploaded and reviewed comprise the complete indexed set of generic ducting and road-construction details, but they do not comprise a complete location-specific construction design. The planning package separates generic details, 17 route-layout sheets, chambers/joint bays and bridge/HDD crossings without providing one route schedule connecting them. Consequently, even after reading the entire ducting series, the public cannot determine which detail, width, depth, ECC arrangement, crossing method, service road, easement or environmental control applies at each identifiable location.

24. Chamber, joint-bay, link-box and marker details - Drawings 142, 143, 144, 146 and 148

24.1 All five sheets are generic details None of Drawings 142, 143, 144, 146 or 148 contains a route chainage, coordinate, townland, numbered chamber location, joint-bay identifier, property reference or site-specific ground/drainage record. They show typical component construction and dimensions. They do not demonstrate where each structure will be built or whether the actual location is suitable.

24.2 Drawing 142 - C2 communications chamber Drawing 142 is expressly labelled as a typical C2 chamber. It shows a precast chamber, cover, step irons and a sump. Its standard construction applies only where formation-level subsoil exceeds a bearing capacity of 100 kN/m2. Temporary excavation support depends upon the subsoil, working method and site constraints and is left for later agreement with the ESB Engineer. The contractor must later provide the excavation method statement and risk assessment. The final position of every C2 chamber is expressly to be agreed with ESB. The drawing therefore does not establish either the chamber locations or their suitability under actual soil, peat, groundwater, traffic and drainage conditions.

24.3 Drawing 143 - transition chamber Drawing 143 is a generic transition-chamber detail. It states that communications ducts are not routed through the chamber and gives an additional requirement if the chamber interfaces with an HDD section.

It does not identify which HDDs require transition chambers, their number or position, the chamber excavation footprint, actual ground conditions, groundwater control or drainage.

24.4 Drawing 144 - 110 kV joint bay Drawing 144 shows a substantial joint-bay structure approximately 6,000 mm long, with a deep sump, associated C2 chamber and link-box arrangements. It is not a minor enlargement of the trench. General Note 1 states that the drawing is for issue purposes and subject to amendment. The standard foundation assumes at least 100 kN/m2 bearing pressure and can only be confirmed following ground investigation and hand-vane testing. Where the bearing pressure is inadequate or peat is encountered, the contractor is to refer to the engineer for guidance. Link-box chambers are to be placed at the road edge or off-road, and the final positions of link-box and C2 chambers remain to be agreed with EirGrid before installation. This confirms that the locations, foundation solutions and peat response for the joint bays and associated chambers were not fixed by the generic planning sheet.

24.5 Drawing 146 - link-box chamber Drawing 146 is a generic link-box chamber with a sump and a 150 mm drain connection. It does not identify where the drain discharges or how groundwater, chamber water and contaminated pumping will be managed. Sulphate-resistant cement is required where aggressive soil conditions apply, but no location-specific soil chemistry identifies where that provision is necessary. The final position of each link box is expressly to be agreed with EirGrid prior to installation.

24.6 Drawing 148 - marker posts and plates Drawing 148 is a typical marker-post/plate sheet. It states that marker posts will delineate off-road duct routes and joint-bay positions and will also be used where burial depth is not standard.

Surface plates are proposed on footpaths, fences, bridges and walkways where cable depth is unavoidably shallow. No route schedule identifies the non-standard or shallow-depth locations. The drawing therefore acknowledges departures from standard burial depth without locating or assessing them. The title block appears inconsistent with the rest of the project set: it gives project number 05-775 and sheet number 05775-DR-148, whereas the drawing index and filename identify project 05-773 and Drawing 05773- DR-148. This should be corrected and the intended project/drawing identity formally confirmed.

Conclusion: These are generic chamber and component drawings. Their own notes confirm that final positions, foundation suitability, peat response, excavation support, drainage and in some cases the design itself remain subject to later investigation, amendment, contractor method statements and EirGrid/ESB agreement. The 6 m joint bays, chambers, sumps, drains, access areas and shallow-depth marker locations create additional excavation, land take, groundwater, drainage, traffic and maintenance effects that cannot be assessed without confirmed coordinates and ground conditions. The application has not provided a complete location-specific chamber and joint-bay schedule, and the marker drawing contains an apparent project and sheet-number error. These matters reinforce the conclusion that the lodged plans describe standard possibilities rather than the final development at each location.

24.7 Normal spacing and route-wide implication EirGrid's published ecology guidance states that underground-cable joint bays generally occur every 500- 700 m along an alignment. Other major-project documentation records a typical 500-850 m range depending upon the cable supplier. The final interval depends upon cable drum length, pulling forces, bends, gradients, installation access, cable design and supplier limitations. On a route described as approximately 32 km, a simple spacing estimate indicates approximately 46-64 cable sections/jointing intervals at 500-700 m, before allowing for route ends and location adjustments. Using the broader 500-850 m range gives approximately 38-64 intervals. This is an indicative calculation, not a finding that a precise number of joint bays has been designed for Lissinagroagh. C2 communications chambers and link boxes are commonly associated with joint-bay locations or required by telecommunications drum length and cable-sheath bonding design. They are not necessarily present in an identical arrangement at every joint bay, which makes a project-specific schedule essential. The generic Drawing 144 shows a joint bay approximately 6 m long, together with a sump and associated chamber/link-box provisions. Repetition at intervals of several hundred metres creates a material route-wide excavation, working-area, access, drainage, traffic and spoil footprint.

Detailed grounds - source page 82

Conclusion: Normal joint-bay spacing means these are recurring major excavations, not isolated minor fittings. The applicant was required to identify their proposed number, chainages, coordinates, associated C2 chambers and link boxes, pulling and working areas, access arrangements, ground investigations and drainage. Leaving final chamber positions to later EirGrid agreement prevents the public and decision-maker from assessing a substantial repeated component of the approximately 32 km development.

24.8 Significance of the drawings reviewed The drawings reviewed raise the following material submission points:

Drawing evidence What it establishes Consent-stage consequence

No chainage-based schedule assigns the applicable detail to each part of the final route. The excavation, spoil, concrete, traffic and environmental effects at identifiable locations therefore remain unresolved.

Numerous alternative public-road, access-track, grassland, forestry-road, off-road and flat duct formations are supplied, both with and without an ECC duct

The construction envelope is not uniform. Width, material, cover, concrete quantity and reinstatement vary materially between alternatives.

The development is substantially more than the narrow line shown on a route map. Working width, temporary support, plant access and spoil storage extend beyond the duct envelope.

The standard trench is approximately 1.315 m deep, while the flat formation is approximately 1.655 m wide and crossing details splay to approximately 1.33-1.53 m

The EIAR and drawings must assess the actual construction corridor, not merely the centreline or nominal permanent easement.

Access-track and grassland notes state that installation across peatland is undesirable and permitted only in exceptional circumstances

The application does not identify every peat crossing, justify it as exceptional, or provide a location-specific peat, hydrology and reinstatement design.

The applicant's own design notes recognise peat as a material siting and construction constraint.

The land take, easements, vegetation removal, drainage change and access rights required for these roads and joint bays must be mapped and assessed. Generic reference to landowner requirements does not establish deliverability.

Off-road sections require service-road access along the route and safe access for cable-pulling vehicles at joint bays

Joint bays require continuing vehicular access and a physical maintenance corridor outside public roads.

The drawings do not identify which method applies at each culvert or utility. Live-water management, ecological protection, temporary support and emergency response are absent from the generic details.

Culvert and utility crossing drawings provide alternative overcrossing and undercrossing arrangements

The final method depends on actual depth, condition, clearance, ground and utility-owner requirements.

Several drawings require later scanning, owner consultation, ground investigation, hand-vane testing, contractor temporary-works design, method statements or engineer agreement

Later verification is acceptable for minor execution detail, but not where the result changes trench width, location, crossing method, land take, drainage, foundation solution or environmental effects.

Material physical conditions and engineering decisions remain for discovery or determination after consent.

Their number, coordinates, chainages, working areas, pulling areas, access, bearing capacity, peat response, groundwater control and drainage must be identified before environmental effects can be assessed.

C2 chambers, transition chambers, link boxes and approximately 6 m joint bays are shown only as typical details

These are repeated excavations and permanent structures rather than minor cable fittings.

The absence of a project-specific joint-bay and chamber schedule conceals a substantial cumulative excavation, spoil, concrete, access, drainage and traffic footprint.

Joint bays normally recur at cable-drum intervals of several hundred metres

On an approximately 32 km route, the joint bays and associated works will recur many times.

The drawings do not identify discharge locations, treatment, pumping controls, receiving drains or waters, groundwater conditions, pollution containment or maintenance responsibility.

Joint bays, C2 chambers and link-box chambers contain sumps; the link-box detail includes a 150 mm drain Water will collect or require management at these structures.

Marker posts identify off-road routes, joint bays and non- standard burial; plates are used where depth is unavoidably shallow

Those departures are not located or tied to actual constraints, receptors or safety and environmental assessment.

The project anticipates shallow and non-standard sections.

The application does not demonstrate that the stated route was fully investigated section by section or that road occupation, settlement, drainage and reinstatement impacts were assessed against verified existing conditions.

Public-road reinstatement depends on existing build-up being confirmed by Leitrim County Council and on later Road Authority direction

Existing pavement conditions and the final reinstatement treatment were not fixed by the planning drawings.

Drawing 148 carries apparent project/sheet identifiers 05- 775 and 05775-DR-148 rather than 05-773 and 05773- DR-148

The applicant must confirm the correct project identity and whether the drawing was prepared and checked for this application.

The lodged drawing contains an apparent document-control inconsistency.

Overall recommended finding: Generic standard details are normal supporting drawings, but they do not replace a route-specific design and environmental assessment. Here, the details themselves identify multiple alternatives, non-standard depths, peat restrictions, future ground testing, later utility investigation, contractor-designed temporary works, later chamber siting and drainage components. Without a single chainage-based schedule linking every section of the final route to the applicable construction detail, joint bay, chamber, crossing method, ground condition, drainage control and land requirement, the Commission and the public cannot determine what will be constructed at each location or assess its likely significant effects. The omission is material to the project description, EIAR, NIS, WFD assessment, road safety, land control and public participation and supports refusal.

24.9 Ground investigation required along the Grid Connection Route A trial pit was not necessarily required at every metre of the route. The developer was nevertheless required to undertake sufficient route-specific investigation to establish the ground, pavement, groundwater and utility conditions that materially determine the design and environmental effects. EirGrid's current underground-cable functional specification expressly requires all proposed joint-bay locations to be surveyed by trial holes and states that boreholes may be necessary in poor ground conditions. The proposed joint-bay locations therefore had to be selected and investigated; they could not properly remain unidentified until construction. The investigation should have combined a continuous route walkover and mapping with targeted intrusive investigation. Depending on the location, this includes trial pits, soil logging and sampling, pavement cores, boreholes or probing, groundwater observations and utility verification. Targeted investigation was particularly necessary at every proposed joint bay and chamber; off-road and peat sections; soft, wet, made or unstable ground; steep slopes; springs and groundwater seepages; karst or suspected voids; bridge, culvert and watercourse crossings; HDD entry and exit compounds; utility crossings;

road sections requiring non-standard or shallow cover; and locations where excavation support, dewatering, discharge or an alternative alignment would be required. The

results should have been presented in a chainage-based ground model or schedule recording soil and peat type and depth, rock level and excavatability, groundwater and drainage, pavement construction, utilities and obstructions, contamination where relevant, bearing capacity at chambers/joint bays, the construction detail selected and the consequences for spoil, water management, traffic, land take and environmental receptors. Detailed contractor verification can refine an established design. It cannot be used for the first discovery of poor ground, peat, rock, high groundwater, a spring, a culvert, unstable excavation conditions or an obstruction where that discovery changes the route, crossing method, trench width, joint-bay location, drainage, land requirement or environmental assessment.

Conclusion: The lodged generic drawings repeatedly state that pavement build-up remains to be confirmed, utilities will be investigated later, ground investigation is required for joint-bay foundations and final chamber positions remain to be agreed. EirGrid's own specification requires trial holes at every proposed joint-bay location. The absence of a disclosed route-wide investigation record and a schedule connecting verified ground conditions to the selected design means the applicant has not demonstrated what the Grid Connection will encounter or what will be built at each material location. This is a consent-stage deficiency, not a minor construction detail, because the missing information can require relocation, wider excavation, different crossings, additional land, dewatering, spoil handling and materially different environmental mitigation.

24.10 Failure to provide sufficient information for effective public participation The application identifies a general Grid Connection Route, but it does not provide a complete location- specific construction design for that route. The drawings present a catalogue of possible standard arrangements. No chainage schedule connects the final alignment to the applicable trench formation, ECC or no-ECC arrangement, joint bay, C2 chamber, link box, transition chamber, culvert or utility crossing method, ground condition, drainage arrangement, working area or land requirement. The public could therefore make only general observations about cable trenching, road disruption, crossings, traffic, pollution, drainage and the range of construction alternatives. It could not determine and comment upon the actual works proposed at an individual property, road section, drain, culvert, watercourse, habitat or other receptor. In particular, the public could not determine:

- where each joint bay and its cable-pulling and working area will be located;

- where C2 chambers, link boxes and transition chambers will occur;

- which sections require the approximately 1.655 m-wide flat duct formation;

- where an earth-continuity-conductor duct is required;

- which culverts and utilities will be crossed above and which will be crossed below;

- where reduced or otherwise non-standard cable cover is proposed;

- which sections contain peat, soft ground, rock, springs, high groundwater or unstable excavation conditions;

- where dewatering will occur, how it will be treated and where it will discharge;

- where additional service-road access, easements or third-party land will be required;

- the excavation and spoil quantity and destination at each material location; and

- the precise effects upon individual homes, roads, drainage systems, watercourses, habitats and landholdings.

These are not minor differences. The alternatives shown differ materially in trench width and depth, concrete content, spoil generation, road occupation, utility interaction, groundwater and drainage effects, working space and land requirements. Subsequent selection of these alternatives can materially affect people, property and environmental receptors that had no effective opportunity to comment on the actual works at the affected location.

Conclusion: Effective public participation requires sufficiently precise information about the development for which permission is sought. Identifying a corridor and presenting multiple possible engineering solutions without stating where each will be used does not provide that information. The route alignment was lodged, but the specific development to be constructed along that alignment remains materially unresolved. The public was confined to general observations and could not scrutinise the actual construction, land take, drainage intervention, crossing method and environmental mitigation proposed at identifiable locations. This defect affects the adequacy of the project description, EIAR, NIS and WFD assessment and the fairness and effectiveness of the public-participation process. It supports refusal rather than post-consent selection of the final design.

24.11 Route-specific Site Location Maps 095-097
The plans identify indicative joint-bay locations. The issue is whether their final design and environmental effects have been established.

Drawing 05773-U-DR-095 is an overall location plan showing the approximately 32 km route between Srananagh Substation and the proposed Lissinagroagh 110 kV substation. It does not provide construction- level detail. Drawings 05773-U-DR-096 and 097 are route-specific plans at 1:10,000. They provide 100 m chainage markings, identify numbered joint bays and identify named bridge crossings. Sheets 1 and 2 together show Joint Bays 1-23, with overlap around Joint Bays 10 and 11, and Bridge Crossings 1-4. The drawings therefore provide indicative route-specific locations for joint bays and bridge crossings. These indicative locations are acknowledged. However, the plans do not fix the final development. Their own
note states that the precise siting of all underground cables, joint bays, earth-sheath link chambers and communication chambers is subject to detailed design, liaison and approval by EirGrid, ESB Networks and the Roads Authority. It further states that final design is subject to site investigation and consultation and that details are indicative and subject to micrositing. The route plans do not assign the applicable generic trench detail to each chainage. They do not state where SD1, SD2, SD4, SD5, flat formation, access-track, grassland, forestry-road or other off-road construction will be used, nor where ECC and no-ECC arrangements apply. They do not present the trial-hole or ground-investigation results for the indicated joint-bay locations, or the soil, peat, rock,

bearing capacity, groundwater, drainage, excavation support, sump discharge, pulling area, permanent access and spoil requirements at each bay. They show existing lake/river and stream networks, planning boundaries, wayleaves and landowner boundaries, but do not provide a location-specific source-pathway-receptor assessment or construction water-management design for every crossing and chamber. My examination of these maps covers Sheets 1 and 2; I have not verified Sheets 3 and 4, Site Location Maps 098 and 099.

Conclusion: The applicant has provided an indicative route alignment, chainage, numbered joint-bay locations and identified bridge crossings. The remaining defect is not the total absence of route-specific mapping. It is that the mapped locations are expressly non-final and subject to detailed design, site investigation, consultation, approval and micrositing, while the plans do not connect each chainage and structure to the applicable construction detail, verified ground conditions, drainage design, land requirement and environmental mitigation. The public could identify the general position of the route and indicated joint bays but

Detailed grounds - source page 85

could not determine the final works and consequences at each location. This finding is subject to the mapping-review limitation stated above.

25. Coillte AIE 20260079 - Glenfarne-side Hen Harrier territory, substation, Grid Connection and 25 m mast

Coillte's released Property Impact Form states that Hen Harrier nesting locations have moved within the broader area from year to year and suggests that this is potentially associated with habitat changes caused by the commercial-forestry cycle. That general explanation does not apply to the Hen Harrier pair on the Glenfarne side. The pair's nesting territory is in open countryside rather than within a rotating commercial-forestry compartment. Plantation growth, maturation and clear-felling do not explain the continued location and use of this territory. Annual movement of the precise nest position within an open-country territory does not establish abandonment and does not make the wider nesting and foraging territory interchangeable with developer- selected biodiversity-management land. This distinction is directly relevant to the Grid Connection application because the Glenfarne-side territory is the location of, and surrounding landscape for, the proposed 110 kV substation, the commencement of the Grid Connection Route and the proposed permanent 25 m telecommunications mast. The assessment must address the combined and continuing effects of the substation, cable works, access, lighting, traffic, noise, vegetation change, mast construction and foundations, mast maintenance, the permanent elevated mast structure and adjoining wind-farm infrastructure upon that established open- country territory. The mast also creates an elevated potential perch for Hen Harrier and other raptors. That does not establish that use or harm is certain, but it is a project feature within a known raptor territory that required explicit ornithological assessment, including attraction, changed flight behaviour, interaction with the substation and other structures, collision or electrocution pathways where applicable, disturbance and maintenance activity.

The applicant cannot rely upon a general forestry-cycle explanation to assume that the pair naturally relocates or will use compensation land elsewhere. It must provide territory-specific evidence, including annual nesting history, habitat classification, foraging use, construction and operational disturbance, displacement risk, mast interaction and the evidential basis for any claimed successful relocation.

Conclusion: Coillte's generalised explanation for movement of Hen Harrier nesting locations does not describe the Glenfarne-side pair, whose territory is in open countryside and is directly affected by the proposed substation, start of the Grid Connection and permanent 25 m mast. The applicant has not demonstrated that annual variation in nest position means abandonment, that the territory can be lost without population consequence, that the mast and associated activity are environmentally neutral, or that this pair will relocate to the proposed management land. This territory-specific omission affects both the Wind Farm and Grid Connection assessments and must be addressed as a combined single-project impact.

26. Repeated boundary, access and monitoring failure at the substation and Saddle Hill

The comparison below must be retained because it enables the decision-maker to identify the same assessment failure at two connected parts of the project rather than treating each omission separately.

Substation Saddle Hill

Assessment concentrates on the development footprint. Assessment concentrates on T2, T3 and Borrow Pit 1.

Adjacent drainage, groundwater and connected land extend beyond the controlled boundary. The connected blanket bog and peat slopes extend beyond the investigated locations and ownership boundary.

A water channel behind the building lies within the wider environmental pathway. Deep and very soft peat forms part of a wider upland system.

The substation lies below the large cave and swallow-hole area. The turbine and borrow-pit works interact with peat whose complete depth and extent outside the investigated points are unknown.

Off-site access for monitoring, sampling and emergency intervention has not been demonstrated.

Off-site access for peat inspection, instrumentation and emergency intervention has not been demonstrated.

Monitoring inside the substation cannot establish what is occurring upslope or within adjoining groundwater pathways.

Monitoring individual turbine sites cannot establish what is occurring within the adjoining peat mass.

Pollution or groundwater changes cross the development boundary. Peat movement and drainage changes cross the development boundary.

The Saddle Hill peat-stability evidence records 4.5 m of peat at T2, with very soft peat in TP42, approximately 2.1 m at T3 and 3.3 m at Borrow Pit 1. FuturEnergy Ireland is the developer. Its 50:50 ownership by Coillte and ESB does not itself establish ownership or legal control of every adjoining parcel forming part of the environmental system. Coillte's AIE/property response is confined to Coillte-held property and records. It cannot establish conditions, ownership, access or monitoring arrangements on non-Coillte land. The Land, Soils and Geology Chapter was completed by TOBIN; its Figure 7-1 was prepared by S. Pezzetta and checked by S. Ryan. The Peat Stability Risk Assessment was prepared by Ciaran Reilly & Associates for TOBIN. FuturEnergy remains responsible for the adequacy of the application, Study Areas and supporting evidence. Chapter 7 identifies a broad 2 km Land, Soils and Geology Study Area, but the intrusive investigation and stability calculations concentrate on selected infrastructure assessment areas. Inclusion within a desktop Study Area does not prove physical access, investigation, monitoring or runout assessment of the complete connected peat system. The application does not clearly identify every adjoining owner or demonstrate enforceable access for investigation, instrumentation, routine monitoring, emergency intervention, containment and downstream sampling. Responsibility for monitoring and responding to project-related effects remains with the developer. It cannot be transferred implicitly to adjoining landowners merely because connected peat, drainage or groundwater lies outside the application boundary or land controlled by the project.

Conclusion: The same project-wide defect occurs at the substation and Saddle Hill. The applicant assessed and proposes to monitor controlled infrastructure footprints while the relevant groundwater, surface- water, karst and peat systems extend beyond those boundaries. It has not demonstrated the complete off-site baseline, ownership, enforceable access, monitoring network or emergency intervention arrangements. This repeated failure affects the Land, Soils and Geology assessment, Peat Stability Risk Assessment, Hydrology assessment, EIAR, NIS and Grid Connection assessment and supports refusal.

27. Land, Soils and Geology and Peat Stability conclusions are not supported by the assessed envelope

Chapter 7 characterises peat/geohazards as low sensitivity after referring to mitigation that will reduce residual peat risk to negligible. This uses the anticipated success of mitigation to support the baseline sensitivity/risk characterisation and obscures the distinction between baseline receptor sensitivity, hazard, pre-mitigation effect and residual effect. Chapter 7 states that barriers or supports such as granular berms or sheet piles may be incorporated and that long-term stability will be ensured by backfilling. The wording confirms that material stabilisation measures have not been fixed location by location at consent stage. Chapter 7 concludes that instability will be localised to individual excavations and controlled by temporary works. That conclusion is not demonstrated for the connected peat outside the selected infrastructure assessment areas, or for initiation and runout across land outside the applicant's control. The Peat Stability Risk Assessment records 4.5 m peat at T2, including very soft peat in TP42, 3.3 m at Borrow Pit 1 and 2.1 m at T3. These conditions cannot be reduced to a general low-sensitivity site description without assessing the complete Saddle Hill peat body, hydrology, slopes and possible movement corridors. The deterministic drained analysis tests water levels from 0% to 75% of peat depth. The report expressly states that 75% represents peat saturated to 75% of the layer height. It does not present a corresponding 100%-saturation calculation, yet states that the 0-75% exercise analysed intense rainfall and extreme weather events. The later conclusion accurately refers to peat becoming partially saturated, but it does not demonstrate stability under complete saturation, perched water, rapid local pore-pressure increase, blocked drainage, concentrated runoff or groundwater changes arising outside the investigated footprint. The justification for limiting saturation to 75% relies on steep slopes and historical drainage. Those same conditions do not guarantee that every connected peat mass will remain below 75% saturation during prolonged or intense rainfall, drainage blockage, forestry windthrow or construction-related alteration. Long- term monitoring data demonstrating that limit have not been identified. The deterministic calculations apply assumed/local parameters to selected assessment areas. They do not establish conditions in unprobed peat outside those areas, including land whose ownership, access, depth and hydrology remain unestablished.

The statement that peat relocation involves “no net loss of material” addresses physical volume, not the loss or alteration of peatland habitat, carbon function, water storage, filtration, slope support and hydrological connectivity. Chapter 7 itself acknowledges deep excavation at some turbines, competent-rock breaking in borrow pits, permanent replacement of natural ground with gravel and concrete, and a certain long-term negative peat effect. Those acknowledgements conflict with presenting the complete site and connected systems as uniformly low sensitivity and low consequence.

Conclusion: The low-to-negligible peat-hazard and site-suitability conclusions are confined to selected locations, assumed parameters, a maximum modelled water level of 75% of peat depth and mitigation whose final form remains for later design. They do not establish stability of the complete connected peat system

under full saturation, altered drainage, off-site initiation or cross-boundary runout. The applicant has therefore not demonstrated that the site is suitable or that significant long-term and cumulative effects are excluded. Permission should be refused.

27.1 Predetermined site selection and failure to update the baseline for later conditions The final Peat Stability Risk Assessment is dated May 2026 and refers to investigations extending to November 2025. It is therefore inaccurate to state that the final technical conclusion itself was reached before 2021. The proper objection is that the project location and development concept had already been selected before the later investigations, after which the assessment tested selected infrastructure areas within that chosen site. The applicant must demonstrate that the evidence independently tested site suitability rather than merely supporting a preselected layout. Neither the Peat Stability Risk Assessment nor Chapter 7 contains a substantive reference to site groundwater or peat-water levels measured during 2023. References to “2023” in Chapter 7 concern plans, programmes and unrelated planning records, not a 2023 hydrological monitoring dataset. Storm Éowyn occurred in January 2025, before completion of the May 2026 Peat Stability Risk Assessment. Neither that assessment nor Chapter 7 identifies Storm Éowyn or demonstrates a post-storm reassessment of the extensive windthrow, exposed peat/root plates, altered drainage, slope response or the suitability of the adjoining borrow-pit area. The applicant refers to multiple walkovers of the proposed wind-farm site. That does not demonstrate physical survey, peat probing, groundwater monitoring or stability assessment of the excluded Dough Mountain summit, NHA peat, connected off-site slopes and complete downslope pathways. The conclusion that the “site” is suitable is expressly confined by the selected site/application boundary and infrastructure assessment areas. It does not establish suitability of the wider receiving environment that controls water, peat movement and downstream consequences.

Conclusion: The final 2026 conclusion was produced after 2023 and Storm Éowyn, yet the submitted assessment does not demonstrate incorporation of 2023 peat-water conditions, a post-Éowyn ground and drainage reassessment, or direct investigation of the excluded Dough Mountain summit and connected off- site peat. The site-suitability conclusion therefore rests on a narrow, infrastructure-led baseline rather than the complete receiving environment and cannot be relied upon.

27.2 April 2022 Property Impact Form and unresolved chronology of the suitability conclusion The released FuturEnergy Ireland Property Impact Form is expressly labelled “Draft Version – April 2022.” On its face, it states that the wind-farm site is low sensitivity, presents low landslide risk, has low-to- negligible peat-instability hazard rankings and is suitable for development. If that conclusion was genuinely reached in April 2022, it preceded the 2023 water conditions, the 2024 Causeway/APEX investigations, Storm Éowyn in January 2025, the 2025 Phase 3 investigations and the May 2026 final Peat Stability Risk Assessment. This supports the concern that site suitability was determined before the later evidence existed. However, the released Property Impact Form material also contains later information and wording that mirrors the 2026 assessment. The April 2022 draft label may therefore have been retained while the contents were updated. If so, the document lacks a transparent revision date and audit trail identifying when each conclusion was inserted, who approved it and

what evidence was available at that time. The applicant cannot rely on both possibilities. It must disclose the original April 2022 version, every subsequent revision, dates, authors, approvals, links/attachments and the evidence supporting each change.

Under either interpretation, the document is material: either it proves that suitability was declared before the later investigations and storm evidence, or it demonstrates defective document control that prevents the public and decision-maker from knowing when and on what evidence the conclusion was reached.

Conclusion: The April 2022 draft date materially undermines the traceability of the low-risk and site- suitability conclusion. The conclusion either predates the later ground investigations, 2023 water conditions and Storm Éowyn, or it was inserted into a document whose version and approval history were not updated transparently. Until the complete version history is produced, the Property Impact Form cannot be relied upon as evidence of an independent, current and auditable assessment of site suitability.

27.3 Documentary chronology and evidence
The April 2022 Property Impact Form, later Property Impact Form extracts and May 2026 Peat Stability Risk Assessment must be distinguished by their individual dates and versions. They cannot be treated as a single undated conclusion. Each quoted statement must be read with its document title, displayed version/date, page, author or originating organisation and the evidence available at that date. The official Coillte AIE reply and released Property Impact Form records are the primary evidence for examining the date, source, authorship, wording and version history. The scope of the AIE response, including its restriction to records concerning Coillte property, is material to that examination. FuturEnergy promotional brochures do not establish this documentary chronology.

The relevant statements concern the low-sensitivity/low-landslide-risk conclusion; northern peat depths of 0.1-3.2 m; low-to-negligible hazard; partial-saturation stability; site suitability; and no risk for Coillte sections of the 110 kV cable.

The Commission is requested to examine the official Coillte AIE response and released FuturEnergy Ireland Property Impact Form records in their original form. The date of the AIE correspondence must be distinguished from the displayed "Draft Version - April 2022" date carried by the Property Impact Form.

28. Developer's own hydrology and hydrogeology description confirms rapid transport pathways at the substation

The released FuturEnergy Ireland Property Impact Form, under Hydrology/Hydrogeology, states that the site spans the Sligo Bay & Drowse and Erne catchments and includes several WFD sub-catchments. It records numerous natural and modified upland streams throughout the site, many flowing through forestry, and describes those watercourses as generally “steep, flashy, and erosion-prone”, influencing both ecological quality and sediment transport. It records historical EPA biological monitoring results ranging from moderate to good, with occasional high-quality reaches, reflecting variable stream conditions. It identifies underlying geology comprising regionally important karstified aquifers, locally important aquifers and poor aquifers. These are admissions from the developer's own project documentation. They independently support the observer's description of rapid upland runoff, erosion and the capacity for sediment and pollution to be conveyed away from the point of release. The description is particularly important at the proposed substation, which is situated below the cave/swallow-hole area, beside or in the vicinity of a water channel, at the start of the permanent Grid Connection and close to the permanent telecommunications mast. A substation-footprint assessment cannot contain or define the receiving environment where water approaches through steep surface pathways and karstified groundwater and then leaves through connected drainage and watercourses. The reference to variable EPA monitoring and occasional high-quality reaches does not reduce the risk. It identifies ecological receptors of differing and, in places, high quality whose condition depends upon preventing sediment, concrete-contaminated water, hydrocarbons and other pollutants from entering rapid pathways.

The coexistence of flashy upland streams and karstified aquifers requires an integrated surface-water/groundwater conceptual model. Surface runoff, fissures, swallow holes, conduits, excavations and drainage cannot be assessed as separate systems. This developer evidence must be cross-referenced to the substation/Saddle Hill comparison table, the off- site access and monitoring failure, the Polldough dye-trace evidence, the cave and swallow-hole mapping, and the downstream Lough Gill and Lough Melvin pathways.

Conclusion: The developer's own Hydrology/Hydrogeology synopsis confirms the physical mechanisms by which construction sediment, peat, contaminated runoff and groundwater disturbance are transported beyond individual infrastructure footprints. Its identification of steep, flashy, erosion-prone streams and karstified aquifers is incompatible with a conclusion that monitoring confined to the substation or other controlled development land is sufficient. The complete upslope, underground and downstream pathways required investigation, access, monitoring and emergency arrangements before permission. Their absence undermines the EIAR, NIS and Grid Connection conclusions and supports refusal.

28.1 No demonstrated location-specific karst investigation of the substation stream and underlying pathway Chapter 7 records one trial pit at the substation to 3.5 m, logging clay and no peat. A shallow trial pit establishes the material exposed in that

hole; it does not determine whether deeper bedrock is karstified, whether concealed voids or conduits occur, or where the adjoining stream and groundwater flow. The Karst Assessment states that deep glacial deposits occur at the substation and identifies alluvium along streams in the central and southern site. These deposits can conceal bedrock karst features from surface inspection. The infrastructure-specific karst treatment for the substation consisted principally of GIS counting of identified surface karst features within 250 m and application of 30 m setbacks from known dolines and 100 m from known swallow holes. The identified karst-feature inventory was derived from aerial photography, LiDAR and site walkovers. The assessment itself found 73 features absent from the GSI database, demonstrating that existing mapping was incomplete. The only disclosed targeted geophysical karst survey was undertaken at T7, approximately 170 m west of identified swallow holes. No ERT, microgravity or seismic-refraction survey is identified at the substation or across the stream behind it. No rotary core borehole is identified at the substation to establish rockhead, bedrock quality, fissures, solution features or voids. The boreholes completed as groundwater monitoring wells were associated with other locations, including Borrow Pit 2; they do not establish groundwater conditions at the substation stream. The Karst Assessment contains no dye-trace record for the substation stream and does not demonstrate tracer testing establishing the stream's recharge area, losing/gaining character, underground route, travel time or receiving water. The assessment defers confirmatory intrusive investigation and geophysics for medium-or-greater karst-risk infrastructure to detailed design. This confirms that the methods capable of detecting concealed voids and solution features were not completed at every material location before consent. A setback from known surface features does not test the bedrock beneath deep glacial deposits or determine hydraulic connectivity. It also does not address a stream that may recharge, receive from or communicate with a karstified aquifer.

Conclusion: The submitted evidence does not demonstrate a location-specific karst and hydrogeological investigation of the proposed substation and the stream behind it. The evidence appears limited to a shallow trial pit logging clay, desktop/GIS feature screening, walkovers and setbacks from known features. No substation-specific borehole, geophysical survey, monitoring well, dye trace or stream-loss/gain investigation has been identified. Because deep glacial deposits can conceal karst and the developer's own evidence confirms flashy streams and karstified aquifers, the source, underground pathway and downstream receptor were not established before permission. This consent-stage omission affects the substation, permanent mast, start of the Grid Connection, EIAR, NIS and emergency-monitoring case and supports refusal.

28.2 Substation at the Coillte property boundary and absence of investigation below it
The Coillte AIE response and released Property Impact Form concern Coillte property and Coillte-held records. Their conclusions cannot be treated as evidence for land, streams, groundwater or karst pathways outside that property.

The proposed substation is situated at or close to the boundary of Coillte property. The stream and downslope receiving environment continue below and beyond the substation into land not demonstrated to be owned or controlled by Coillte or

FuturEnergy Ireland. No location-specific intrusive, geophysical, groundwater, dye-tracing or stream-flow investigation has been identified on the land immediately below the substation or along the continuation of the stream outside the Coillte boundary. The shallow trial pit at the substation provides no evidence about deeper bedrock beneath the development and no evidence about the downstream land. It cannot establish where surface water infiltrates, where groundwater travels, whether karst conduits are present or where pollution will re-emerge. The developer has not identified the downstream landowners or demonstrated enforceable access for baseline investigation, water sampling, groundwater monitoring, emergency containment, pollution tracing or remediation. Monitoring confined to the substation compound will detect only conditions at the controlled footprint. It will not identify changes developing downstream, within concealed karst, or on third-party land before effects reach connected watercourses.

Conclusion: The substation is positioned at the edge of the property addressed by the Coillte records, while the stream, groundwater and possible karst pathways continue below it. The applicant did not demonstrate investigation of the land and water pathway below the substation or legal access to monitor and intervene there. The Coillte property boundary was therefore treated as if it contained the receiving environment, although the developer's own evidence confirms that flashy streams, sediment transport and karstified groundwater cross that boundary. This is the same ownership-led assessment failure identified at Saddle Hill and is a material ground for refusal.

28.3 Unsupported generic statement that groundwater effects are negligible The released Property Impact Form states, in substance, that because wind-farm developments involve near-surface construction activities, effects on groundwater are generally negligible and surface water is generally the principal sensitive receptor assessed in impact assessment. That is a generic proposition about wind-farm development and is not a location-specific conclusion for this karst, peat and groundwater setting. The same developer material identifies regionally important karstified aquifers. In karst, groundwater is both a receptor and a rapid transport pathway connecting infiltration points, fissures, swallow holes and concealed conduits to springs, streams and downstream waters. The project is not confined to superficial disturbance. It includes deep turbine and hardstanding excavations, borrow pits extending several metres below ground, rock breaking/blasting, road cuttings, drainage interception, cable trenches, substation foundations and HDD/crossing works. These activities can encounter or alter groundwater, fractured bedrock and groundwater-dependent pathways. Oil spills and refuelling leaks are not the only groundwater risks. The assessment must address concrete/cement-contaminated water, drilling fluids, suspended sediment, disturbed peat water, fuels and hydraulic oils, excavation dewatering, altered recharge, interception or redirection of shallow groundwater, increased flow through fractures, loss of water into karst and discharge from temporary or permanent drainage. Describing impacts as “minor” and “local” assumes that pollutants remain close to the release point. The Polldough connection and the identification of karstified aquifers demonstrate why that assumption cannot be made without site-specific pathway testing. Surface water being the principal visible receptor does not make groundwater negligible. Groundwater can convey a pollutant

underground and discharge it later into a surface-water receptor. The two systems must therefore be assessed together. At the substation, no location-specific investigation has been identified demonstrating hydraulic separation between the compound, the stream behind it, the underlying bedrock and downstream land outside the Coillte boundary. Careful management and mitigation do not replace the missing baseline. Mitigation cannot be designed or its effectiveness verified without identifying the source, pathway, travel direction, receiving point, monitoring locations and access arrangements.

Conclusion: The generic statement that groundwater effects from wind farms are normally negligible is inapplicable to this project and contradicted by the developer's own identification of karstified aquifers, swallow holes, numerous previously unmapped karst features and rapid sediment-transporting streams. The application has not demonstrated that groundwater impacts at the substation or other deep excavation locations will be minor, local or contained. The groundwater pathway required location-specific investigation and integrated assessment with surface water before permission; proposed spill-management measures do not cure that omission.

28.4 Generic assumption used inside a project-specific Lissinagroagh report The statement was not taken from general guidance offered independently of the project. It appears in a FuturEnergy Ireland Property Impact Form prepared specifically for the proposed Lissinagroagh Wind Farm. The purpose of a project-specific assessment is to determine the effects of the actual development in the actual receiving environment. It cannot discharge that function by stating what is “generally” true of wind- farm developments and transferring that assumption to Lissinagroagh without location-specific proof. By the time of the assessment, the project evidence identified steep and flashy streams, erosion and sediment transport, regionally important karstified aquifers, swallow holes, dolines, deep deposits capable of concealing karst and numerous features absent from the national database. Those conditions required the author to test whether Lissinagroagh departed from the general assumption. Instead, the report asserted that groundwater effects were generally negligible and then treated oil/refuelling incidents as minor local effects managed by standard mitigation. The use of generic language inside the project-specific report is therefore evidence of an untested premise within the assessment, not an answer to the site-specific concern.

Conclusion: FuturEnergy prepared the Property Impact Form for this wind farm and was required to assess Lissinagroagh's actual karst, groundwater, stream and construction conditions. Its reliance on what is “generally” expected from wind-farm construction does not establish what will occur at this site. The project- specific evidence points to rapid and extended groundwater/surface-water connectivity, while the report supplies no location-specific testing capable of supporting the negligible, minor and local characterisation. That conclusion cannot be relied upon.

28.5 The Hydrology/Hydrogeology conclusion is expressly qualified by property ownership
The material evidence is the limiting language in the released record, particularly the qualification "within Coillte property." Those words define the extent of the conclusion and prevent it from being

presented as an assessment of the complete receiving environment or Grid Connection Route.

The conclusion must be read together with its qualification. My objection concerns that limitation:

The hydrology and hydrogeology conclusion is limited to works or cable sections within Coillte property. It does not report testing of conditions or assessment of effects outside Coillte ownership, and it does not establish that groundwater, surface-water, sediment or pollution pathways terminate at the property boundary.

The developer's own wording confines the conclusion to Coillte land. It leaves the non-Coillte route, adjoining land and cross-boundary pathways unassessed.

28.6 Wind-farm-site assessment followed by a limited grid reference is not a comprehensive whole-project study The Hydrology/Hydrogeology material principally describes and assesses the proposed wind-farm site. It then refers separately and briefly to the two sections of the 110 kV underground cable within Coillte property. This structure does not provide a continuous assessment from the wind-farm infrastructure and substation through the complete Grid Connection Route to Srananagh. It does not identify the ground, groundwater, drainage, karst, watercourse and downstream receptor conditions at every cable section, joint bay, HDD, bridge, culvert and other works location outside Coillte property. It does not integrate construction effects arising at the wind farm with the cable trench and road-drainage corridor, or assess how effects will pass between Coillte land, third-party land, public roads and connected catchments. A short property-limited grid conclusion cannot be treated as an assessment of an approximately 32 km linear development, particularly where the project documents give inconsistent route lengths of approximately 30.6 km, 32 km, 33.5 km and 36.5 km.

Detailed grounds - source page 92

Requested finding: The Hydrology/Hydrogeology material is a wind-farm-site assessment supplemented by a restricted reference to two grid sections within Coillte property. It is not a comprehensive, route-wide and integrated assessment of the wind farm and Grid Connection as one project. The omitted non-Coillte route and cross-boundary pathways prevent the EIAR, NIS and WFD conclusions from establishing the environmental acceptability of the complete development. Permission must be refused.

28.7 “In these areas” does not address karst pollution or effects on fish and aquatic ecology The Property Impact Form states, in substance, that measures on Coillte property will protect downstream surface-water quality and ensure that the development “in these areas” does not have the potential to result in a significant effect on the hydrological and hydrogeological environment. The limiting words are material and must remain attached to the conclusion.

Applicant's wording Material limitation

“Coillte property” The statement is ownership-limited and does not assess the complete Grid Connection Route or adjoining third-party land.

“in these areas” The no-significant-effect conclusion applies only to the identified Coillte areas and cannot be extended to works, pathways or receptors elsewhere.

Protection of “downstream surface water quality” This does not demonstrate investigation of pollutants entering swallow holes, fissures, conduits or other karst groundwater pathways and re-emerging at distant springs or streams.

No corresponding evidence is identified showing how changes in water quality, sediment, drilling fluid, concrete-contaminated water or other pollutants were assessed for fish, spawning gravels, lamprey, eel, White-clawed Crayfish, macroinvertebrates or the conservation objectives of downstream protected waters.

No significant hydrological or hydrogeological effect

The distinction between hydrology/hydrogeology and aquatic ecology is decisive. A statement about surface- water quality is not an ecological assessment. It does not identify the pollutant source, underground karst pathway, emergence point, concentration, duration, affected reach or biological receptor. Nor does it demonstrate that an underground release will be detected by monitoring confined to visible surface-water locations within Coillte property.

The applicant's own evidence identifies karstified aquifers, swallow holes and numerous possible karst features, while the Polldough evidence records an underground connection of approximately one kilometre. These conditions required an integrated assessment of groundwater transport and the resulting consequences for downstream fish and aquatic life. The quoted passage contains no such analysis.

Requested finding: The words “Coillte property” and “in these areas” expressly restrict the applicant's conclusion. Its reference to protecting downstream surface-water quality does not assess pollution entering and travelling through karst groundwater or the resulting effects on fish and aquatic ecology. The conclusion therefore cannot establish no significant effect for the complete wind farm and Grid Connection, the connected catchments or protected downstream waters. This is a material gap in the EIAR, NIS and WFD assessment and supports refusal.

I rely on the qualifications "Coillte property" and "in these areas" as part of the applicant’s own wording. My analysis must be distinguished from the official record. The Commission is requested to examine the original reply and released records, with their document titles, authors or issuing bodies, dates and page references, so that the precise scope of the conclusion can be verified.

29. Forestry and Hen Harrier constraints shaped the 2025 site-investigation pattern

The released Property Impact Form states that no felling was required for the 2025 site-investigation works. It describes the investigation as localised and small scale,

with the majority consisting of hand gouge augering. Machinery access was limited to nine trial-pit locations that were stated to be sufficiently distant from, and screened by mature trees against, disturbance to breeding Hen Harrier. Brashing involved removal of branches to facilitate pedestrian access. That statement confirms investigation access through or beside forestry and reinforces the photographic and mapping observation that the 2025 intrusive points were concentrated in forestry or forest-edge settings.

The wording does not prove that every trial pit was physically inside a plantation; the precise position must be demonstrated by overlaying all nine trial pits on current aerial photography, habitat mapping, the final layout, property boundaries and the open upland/blanket-bog areas. The admitted restrictions are material to representativeness. Machinery did not range freely across all final infrastructure locations, open bog, steep ground, Dough Mountain slopes, Saddle Hill peat, stream corridors and excluded third-party land. Hand gouge augering supplies shallow point information and is not equivalent to rotary boreholes, geophysics, groundwater monitoring or investigation of concealed karst, bedrock and deep groundwater. The statement that no breeding Hen Harrier was present in the 2025 season does not establish absence of an established territory, nesting use in other surveyed years or future reuse. It also does not retrospectively make the restricted investigation pattern representative. If Hen Harrier protection constrained investigation before consent, the application had to acknowledge the resulting evidence limitations. It could not both avoid areas to prevent disturbance and then rely upon the absence of intrusive evidence from those areas as support for low environmental or geotechnical risk.

Conclusion: FuturEnergy's own Property Impact Form confirms that the 2025 site investigation was localised, predominantly hand-auger based and that machinery was confined to nine trial pits positioned to use mature-tree screening. This supports the observation that forestry location and ecological constraints shaped the investigation pattern. The resulting evidence cannot be treated as representative of the complete open upland, blanket-bog, slope, stream, karst and third-party land environment. The applicant was required to disclose that limitation and demonstrate equivalent non-disturbing investigation of the omitted areas before concluding that the complete site was suitable.

29.1 Clarification of “none in 2025” and discrepancy in trial-pit count Grammatically, the parenthetical statement that there were “none in [the] 2025 breeding season” refers to breeding Hen Harrier, not to trial pits. It does not state that no trial pits were excavated. The Property Impact Form states that machinery access was limited to nine trial-pit locations, indicating trial-pit work or machinery access for such work during the 2025 site investigation. The Karst Assessment separately states that Phase 3 in 2025 comprised eight trial pits, completed by Ground Investigations Ireland to a maximum depth of 3.2 m. The difference between nine trial-pit locations in the Property Impact Form and eight completed trial pits in the Karst Assessment must be reconciled. Possible explanations include one planned/accessed location not excavated, one aborted pit, or inconsistent reporting, but no explanation should be assumed without the field records. The applicant must provide a schedule listing every planned, attempted, completed, relocated and abandoned 2025 trial pit, together with identifier,

coordinates, date, maximum depth, termination reason, photographs, habitat/forestry setting and corresponding final infrastructure.

Conclusion: The records confirm 2025 trial-pit activity but report it inconsistently as nine machinery- access locations and eight completed Phase 3 pits. The phrase “none in 2025” concerns breeding Hen Harrier and must not be misread as meaning no pits were dug. The unexplained numerical difference further weakens the traceability and completeness of the 2025 investigation record.

30. July 2026 Property Impact Form repeats superseded peat depths and unsupported no-risk conclusions

The July 2026 Property Impact Form states that investigations “within the proposed wind farm site” found peat depths of 0.1-3.2 m in the north and 0.1-1.2 m in the south. By July 2026, the May 2026 Peat Stability Risk Assessment and Karst Assessment recorded peat to 4.5 m in the north and 1.8 m in the south. T2 is specifically assessed using 4.5 m peat from probes, with very soft peat in TP42. The July 2026 form therefore understates the submitted maximum peat depth by 1.3 m in the north and 0.6 m in the south. This is not rounding; it is a materially different ground model. The form expressly confines the source investigation to the proposed wind-farm site, yet describes it as a baseline for the “receiving environment.” It does not establish the depth, continuity, saturation, groundwater or stability of connected peat outside that site. The form states that alluvium occurs along central and southern streams and consists of typically loose, well- sorted silt and sand-sized particles. Such deposits are relevant to erosion, sediment mobilisation, bearing conditions, stream-bank stability, groundwater interaction and pollution transport; they do not support an unqualified low-sensitivity conclusion.

Detailed grounds - source page 94

The form places scree west of the proposed site along Dough Mountain, while the Karst Assessment describes scree east of the proposed wind-farm site along the Dough Mountain slopes. The apparent directional inconsistency must be resolved against the mapping before avoidance can be relied upon. The form reduces karst to dolines and three swallow holes, although the specialist Karst Assessment identifies 73 previously unmapped possible karst features, including the swallow holes. Avoidance of mapped surface features does not establish absence of concealed conduits or hydraulic connectivity. The July 2026 form repeats the conclusions of low site sensitivity, low landslide risk, low-to-negligible peat hazard, stability under partial saturation and site suitability without explaining the revised 4.5 m/1.8 m evidence or showing reassessment of the conclusions against the deeper peat. Its statement that there is “no risk to land, soils and geology and peat stability associated with either section of 110 kV underground cable within Coillte property” is expressly limited by ownership. The form identifies no tests supporting that conclusion at each of the two Coillte cable sections and reports no equivalent testing or effect assessment for the route outside Coillte property. The qualification “within Coillte property” prevents the statement from supporting a conclusion for the complete Grid Connection Route. It does not address third-party lands, public-road verges, watercourse crossings, joint bays, HDD locations, the substation boundary, groundwater or karst pathways, or effects that originate within Coillte land and continue beyond its boundary. Environmental pathways do not stop at ownership lines. Groundwater, intercepted drainage, sediment, drilling fluid, contaminated runoff and peat or soil movement can cross from Coillte property into adjoining land and connected surface waters. A property-limited conclusion cannot establish the absence of those cross-boundary effects. No comparative schedule has been identified showing what intrusive ground investigation, groundwater monitoring, karst investigation, peat probing or crossing-specific assessment was completed on every non- Coillte section of the approximately 32 km route. The missing evidence is especially material where the route follows public roads and third-party land and connects to tributaries leading towards the Owenmore River/Lough Gill and the Lough Melvin catchment.

Conclusion: The July 2026 Property Impact Form was issued after the final specialist reports but repeats peat-depth maxima of 3.2 m north and 1.2 m south, whereas the submitted May 2026 evidence records 4.5 m and 1.8 m respectively. It then repeats the favourable risk and suitability conclusions without demonstrating reassessment against the deeper peat. Its no-risk statement is restricted to two sections of the 110 kV cable within Coillte property, yet it identifies neither the tests supporting that statement nor testing and effects assessment outside Coillte ownership. The conclusion therefore cannot be extended to the complete route or to cross-boundary groundwater, drainage, peat, sediment and pollution pathways. This post- assessment inconsistency and ownership-limited evidence show that the Property Impact Form did not accurately incorporate the final ground model and cannot be relied upon as a current, coherent or auditable assessment of the overall project.

30.1 Ownership-limited assessment does not establish route-wide safety

What the form states What it fails to establish Project consequence

No risk associated with either 110 kV cable section within Coillte property

The location, type, duration and results of tests supporting that conclusion

The no-risk statement is unsupported even within its stated property limit unless the underlying evidence is produced

Assessment confined to Coillte land Ground, peat, groundwater, karst and drainage conditions on third-party land and in the public-road corridor

The evidence does not cover the complete Grid Connection Route

Effects passing across the ownership boundary through groundwater, drains, streams, sediment or ground movement

Property-based conclusion

The assessment boundary is not an environmental boundary

Which joint bays, HDDs, bridge/culvert crossings, cable trenches and sensitive receptors received intrusive or hydrological investigation

The public and decision-maker cannot verify that the final design is suitable at each works location

No identified route-wide investigation schedule

No-risk wording for selected sections Consequences if later investigation or landowner constraints require relocation or material redesign outside Coillte land

Fundamental suitability and environmental effects are deferred beyond consent-stage scrutiny

Requested conclusion: The applicant has not demonstrated route-wide safety by making a property-limited statement about two Coillte cable sections. In the absence of identified supporting tests within those sections and equivalent investigation of the non-Coillte route, the application has not established the receiving environment, cross-boundary pathways or effects of the complete Grid Connection. The EIAR, NIS and WFD conclusions cannot rely on this restricted evidence, and permission must be refused.

31. July 2026 baseline omits post-storm conditions, overhead scree and consequences beyond the site

31.1 A baseline must describe the environment at the assessment date A July 2026 project-specific Property Impact Form should describe material conditions existing by that date, including the consequences of Storm Éowyn in January 2025 and other storm damage observed on Dough Mountain. No substantive reference has been identified in the Property Impact Form, Chapter 7 or Peat Stability Risk Assessment to the extensive 2025 windthrow adjoining/overlooking the borrow-pit area, exposed peat and root plates, altered drainage, blocked channels, the reported road washout near the top of Dough Mountain, subsequent tree clearance or major road repairs. These events occurred on or affected Coillte property before the July 2026 form and were observable evidence relevant to ground response, drainage capacity, erosion, slope stability, forestry anchorage and the suitability of the borrow-pit area. My dated photographs of the road and trees before and after the storm provide local evidence of conditions adjoining the proposed borrow pit and wider upland setting. An assessment that omits known post-storm changes does
not establish the current receiving-environment baseline. It describes an earlier or incomplete condition and cannot support definitive post-storm conclusions of low risk and suitability.

31.2 Avoidance of scree does not assess the overhead source area The Property Impact Form acknowledges scree on the Dough Mountain slopes but states that the layout avoids it. It also states that site investigations were undertaken within the proposed wind-farm site. Physical avoidance of the mapped scree footprint is not an assessment of its stability, extent, upslope controls, groundwater, drainage, potential movement or runout towards infrastructure below. The applicant has not demonstrated direct investigation of the complete scree area above the turbines, roads, substation and borrow pits, or shown how its boundary was verified where it lies outside the investigated site. A feature situated outside or above the development can still be a hazard source. The relevant assessment must follow the source, pathway and receptor, not stop at the planning or ownership boundary.

31.3 Wrong risk question: sensitivity of the site versus hazard posed to surrounding land and water The exact conclusion is that “the proposed wind farm site is a low sensitive site in terms of land soil and geology and poses a low risk for landslide.” This focuses on the susceptibility or sensitivity of the infrastructure footprint. It does not adequately answer the separate question of the hazard the development poses to surrounding peat, forestry, roads, private land, streams, karst groundwater and downstream receptors. Consequence depends on what lies downslope and hydraulically connected, not only on the sensitivity rating assigned to the excavation point. The term “overall” masks local high-consequence conditions. A site-wide average or general conclusion cannot displace deep peat at T2, higher-susceptibility locations, Borrow Pit 2's moderately high mapped susceptibility, overhead scree, storm windthrow, washed-out drainage/road evidence, swallow holes, karst and rapid downstream pathways. The favourable overall characterisation must be reconciled with the official NPWS description of vulnerable upland blanket bog and the concerns recorded by Leitrim County Council, rather than treating the controlled development

footprint as the complete receiving environment.

31.4 Meaning and limits of the deterministic stability analysis A deterministic stability analysis is a mathematical calculation using fixed input values for matters such as peat depth, slope angle, unit weight, shear strength, water-table height and construction surcharge. The infinite-slope calculation compares resisting forces with driving forces and produces a factor of safety for the assumed failure surface and input conditions. A factor above the adopted threshold means the modelled slope is calculated to be stable under those assumptions. It is not a field test proving that the complete mountain peat system is stable. Its conclusion is valid only for the locations, geometry, material parameters, water level, loading and failure mechanism represented.

The Lissinagroagh drained sensitivity analysis models water levels from dry to 75% of peat depth. “Partially saturated” therefore means the water level was assumed to rise no higher than 75% of the peat layer. It does not test full saturation to the ground surface. No long-term dataset has been identified demonstrating that peat and groundwater during the wet 2023 conditions, prolonged rainfall, blocked drainage or post-storm conditions remained within the assumed 75% limit across the connected site and off-site peat. The calculation does not by itself demonstrate incorporation of progressive failure, local erosion, root-plate disturbance and preferential pathways created by windthrow, a washed-out road or damaged drainage, concealed karst, rapid pore-pressure changes, off-site initiation, cross-boundary runout or every altered drainage condition during construction.

31.5 Construction will change the conditions used by the model At infrastructure footprints the project will excavate and relocate peat and soil and replace natural ground with rock fill, concrete, roads, hardstandings, drainage, foundations and cable infrastructure. Forestry removal, excavation, loading by heavy plant, rock breaking, drainage interception and creation of impermeable or rapidly draining surfaces will alter loading, support, infiltration, runoff concentration and shallow groundwater movement. The relevant question is not whether the pre-construction materials are stable under selected assumed conditions. It is whether the complete system remains stable during and after each construction change, including interaction with overhead peat/scree, karst and land outside the applicant's control. The submitted “stable” conclusion does not demonstrate that all those changed conditions, combined pathways and downstream consequences were modelled before consent.

Conclusion: The July 2026 Property Impact Form does not establish a current or complete baseline. It omits material post-Storm Éowyn ground and drainage evidence on Coillte property, treats avoidance of overhead Dough Mountain scree as if it removed the hazard, confines investigation to the proposed site and asks whether the footprint is sensitive rather than what hazard the development poses to the connected surrounding landscape. Its deterministic analysis proves only the output of a selected mathematical model under fixed inputs, including water levels no higher than 75% of peat depth. It does not prove stability under the wettest observed conditions, full saturation, post-storm drainage damage, construction-altered hydrology, off-site initiation or karst-connected runout. The low-sensitivity, low-landslide-risk, low-to-negligible- hazard and site-suitability conclusions are therefore unsupported and cannot justify permission.

32. Substation technical drawings define structures but defer site suitability and environmental detail

Six further planning drawings have been reviewed as a connected substation set: the site-layout plan, compound elevations, EirGrid control-building plan/sections, IPP building plan/elevations/sections, compound and access- road details, and gate/fence details. They confirm that a substantial engineered compound is proposed at a fixed location, with electrical plant, two buildings, internal roads and hardstanding, cable infrastructure, lighting, drainage-related gradients, fencing, gates and concrete foundations. They do not constitute evidence that the receiving ground and water environment at that location has been adequately investigated.

32.1 Site-specific layout, but expressly provisional design Drawing 05773-U-DR-130 is a site-specific layout at 1:500 and depicts the red-line boundary, access, compound arrangement, buildings and electrical equipment. Its notes state that the configuration of substation equipment and infrastructure is subject to detailed design and EirGrid design approval and that the layout is to be used for planning purposes only. The same drawing states that equipment is shown indicatively and for illustration purposes only, that final design is subject to site investigation and consultation, and that details are indicative and subject to micrositing. Those reservations are material. Micrositing or later detailed design cannot be used to discover or resolve a concealed karst conduit, unstable deposit, unsuitable bearing stratum, groundwater pathway, drainage conflict, watercourse constraint or land requirement that could force material relocation or redesign after permission.

32.2 Standard construction details do not prove suitability at this location Drawings 05773-U-DR-134 and 135 show conventional control-building and IPP-building construction, including reinforced concrete slabs and strip foundations.

Detailed grounds - source page 97

Drawing 05773-U-DR-136 includes a generic floating-road detail over peat, using geotextile and 600 mm of Class 6F2 material, together with a 2% fall towards a drain. It also contains standard compound, concrete- road, joint and lighting-column details. Drawing 05773-U-DR-137 provides standard palisade-fence and gate details; part of the concrete foundation design is left to later detail. These drawings explain how standard components can be constructed. They do not identify the actual peat depth, bearing stratum, rockhead, groundwater level, karst condition, drainage destination, excavation depth, cut-and-fill balance or foundation response at the precise location of each structure.

32.3 Drainage and water-pathway information is incomplete The access-road detail directs a 2% crossfall towards a drain, but this set does not demonstrate the complete destination, capacity, treatment and outfall pathway for collected water under ordinary operation, intense rainfall, blockage or construction disturbance. The site-layout plan depicts the compound close to the mapped water environment, yet the drawing set does not contain a site-specific hydrological section showing existing surface-water and groundwater levels, the water channel behind the substation, drainage interception, karst pathways, treatment features and the final discharge

receptor together. Rainwater-harvesting references on the control-building drawing concern roof water management; they do not answer how groundwater, cut-off drainage, contaminated runoff, transformer-related pollution, sediment or water intercepted by roads and foundations will be controlled.

32.4 The drawings expose a consent-stage information gap

Drawing information supplied Material information not established by the drawings
Consequence

Site-specific compound footprint and access Complete ground model beneath every building, item of plant, road and cable interface

Bearing, settlement, excavation and stability conclusions cannot be verified from the drawings

Indicative electrical layout and elevations Final plant arrangement and final engineering design The public is not shown the complete consent-stage development configuration

Standard strip foundations and reinforced slabs Location-specific foundation type, depth, rock excavation and groundwater control Later site investigation could require material redesign

Floating-road detail over peat Where that detail will be used and the actual peat depth, strength and hydrology there A generic option is not a mapped construction solution

Road crossfall towards a drain Drain alignment, capacity, treatment, outfall and connected receptor Pollution and flood pathways remain incomplete

Gates, fencing and lighting details Environmental interaction with the nearby mast, water channel, karst and protected downstream waters

Architectural/security detail does not cure the environmental baseline deficiency

32.5 The submitted pole heights must be described accurately Drawing 05773-U-DR-139 states that the telecom pole length ranges up to 23 m, with 2.3 m below ground level. The maximum exposed height shown is therefore approximately 20.7 m, not 25 m. Drawing 05773-U-DR-138 separately identifies an 18 m lightning monopole with a substantial reinforced- concrete foundation. Its notes require a minimum ground bearing capacity of 100 kN/m² and leave the foundation depth at 2,500 mm “TBC [by the] site engineer depending [on] ground conditions.” The 23 m telecom pole and 18 m lightning monopole must not be conflated with any separate 100 m meteorological mast or with one another. Each has a distinct function, foundation, collision/perching profile and environmental setting. The requirement for the lightning-monopole formation level and foundation to be inspected and approved before concrete is poured is a construction-control measure.

It is not evidence that bearing capacity, groundwater, karst and settlement at the proposed location were established before consent.

32.6 Cut-and-fill drawings establish substantial ground alteration Drawing 05773-U-DR-150 records a proposed cut volume of 14,231 m³ and a proposed fill volume of 13,591 m³ for the substation. Drawing 05773-U-DR-151 illustrates the corresponding cut-and-fill sections. The note that the compound elevation will be selected using localised topography so that cut and fill are “balanced” does not demonstrate that the excavated material is geotechnically and environmentally suitable for reuse, nor does it explain the apparent 640 m³ difference between the stated cut and fill figures.

Detailed grounds - source page 98

These volumes establish extensive excavation, ground loading, regrading and drainage alteration close to the mapped water channel and within the wider karst and steep-headwater setting. The effects must be assessed with the substation buildings, electrical plant, roads, cable entries, poles and downstream pathways as one system. The cut-and-fill plan repeats that precise siting of underground cables, joint bays, earth-sheath link chambers and communication chambers is subject to detailed design and that final design is subject to site investigation and micrositing. That wording confirms that material elements and the evidence needed to settle their locations remain deferred.

32.7 The drainage sheet is a library of typical components, not a complete drainage design Drawing 05773-U-DR-141 shows typical details for a 10,000-litre foul-water holding tank, rainwater downpipe, road gully, manhole and retention separator tank. It does not provide a plan locating and connecting every gully, pipe, cut-off drain, separator, tank, attenuation feature and outfall across the compound. It does not state the design storm, climate-change allowance, contributing catchment, discharge rate, storage requirement, exceedance route, maintenance response, final outfall coordinate, receiving waterbody or separation from karst pathways. A typical separator detail does not demonstrate how sediment, concrete-contaminated water, transformer oil, fuels, intercepted groundwater and runoff will be contained during construction, operation, extreme rainfall, blockage or failure. The missing route from source to treatment to outfall is especially material because the substation sits beside a water channel and below the identified Dough Mountain karst and swallow-hole setting. The drainage assessment must follow the water beyond the red line to the downstream receptor.

Requested finding: The drawings confirm the scale and physical permanence of the proposed substation compound, including 14,231 m³ of cut, 13,591 m³ of fill, an 18 m lightning monopole, a telecom pole up to 23 m long, substantial foundations, roads, drainage components and electrical plant. They nevertheless defer configuration, detailed design, site investigation and micrositing and provide typical components rather than a complete location-specific design founded on demonstrated ground, groundwater, karst and drainage conditions. The drainage sheet does not show the complete treatment and outfall pathway. Because the substation lies below the

Dough Mountain karst setting, beside a water channel and close to the wider mast and grid infrastructure, those omissions concern whether the proposed location is

environmentally and geotechnically acceptable. They cannot be left to post-consent investigation or contractor design. The drawing set therefore reinforces, rather than resolves, the consent-stage information deficiency and supports refusal.

33. Bridge HDD drawings identify three crossings but defer the decisive ground investigation and final bore position

Drawings 05773-U-DR-152, 153 and 154 provide route-specific plans and profiles for Bridge Crossings 01, 02 and 03. Unlike the generic trench details, they include local mapping, photographs, proposed launch and reception areas, entry and exit coordinates, bore arrangements and indicative longitudinal profiles. They are therefore useful evidence of the scale of the proposed works, but they do not establish that HDD is environmentally or geotechnically acceptable at the three locations.

33.1 What the drawings establish

Crossing Stated HDD length Common proposed arrangement

Three separate 355 mm bores; power and communications ducts; launch and receptor pits; HDD rig/hardstand; stated minimum 1.5 m separation beneath river bed

Bridge 01 99.30 m curve distance

Three separate 355 mm bores; power and communications ducts; launch and receptor pits; HDD rig/hardstand; stated minimum 1.5 m separation beneath watercourse bed

Bridge 02 99.00 m horizontal distance

Three separate 355 mm bores; power and communications ducts; launch and receptor pits; HDD rig/hardstand; stated minimum 1.5 m separation beneath watercourse bed; relationship with Joint Bay JB17 shown

Bridge 03 128.0 m horizontal distance

The drawings also show temporary launch/reception work areas and refer to containment of drilling fluid and extracted frac-out material. They establish that the crossings require substantial temporary compounds and subsurface drilling, not merely the placement of cable within an existing road.

33.2 The drawings expressly defer the final HDD locations Each drawing states that the positions of HDD launch and reception points will be selected following site investigations and detailed design. That reservation sits uneasily with the entry and exit coordinates and apparent alignment presented for planning. The lodged coordinates cannot be treated as final while the notes permit later selection of the working points. Moving a launch pit, reception pit, hardstand or bore alignment changes land take, traffic interaction, vegetation removal, drainage, groundwater interception, proximity to a watercourse and the pathway for a drilling-fluid release. If investigation after consent shows that the proposed alignment is unsuitable, the resulting relocation is not necessarily a minor construction detail. It can change the environmental effects and the land or access required.

33.3 A drawn bore profile is not a crossing-specific ground model The profiles label the drill path as indicative and show minimum cover, but the drawings do not contain crossing-specific borehole or trial-pit logs along the full drill path. They do not identify the depth and continuity of soil, peat, alluvium, weathered rock, competent rock, fissures, voids or karst beneath each watercourse and its banks. They do not show seasonal groundwater levels, hydraulic gradients, artesian conditions, permeability, loss zones or the connection between groundwater and the watercourse. A minimum 1.5 m separation from the watercourse bed is a geometric criterion. Without the intervening material and groundwater conditions, it does not demonstrate protection against hydraulic fracture, inadvertent drilling-fluid return, collapse, settlement or pollution migration.

33.4 Frac-out containment is reactive and incomplete A temporary bund or containment area at the rig and pit addresses material recovered at those controlled locations. It does not contain drilling fluid that escapes through fissures, gravel, alluvium, drains, karst conduits or the watercourse bed away from the work area. The drawings do not set out drilling-fluid composition, maximum allowable pressure, drilling-pressure monitoring, loss thresholds, shut-down triggers, fluid-balance records, watercourse monitoring, emergency isolation, recovery methods or downstream notification and remediation. They do not show what action will be taken if a release occurs in an inaccessible bank, beneath the channel or on third-party land, or how fish and other aquatic receptors will be protected during an incident. These matters must be resolved against the actual ground and water conditions before consent. A later contractor method statement cannot determine for the first time whether HDD is acceptable at the approved crossing.

33.5 Public and decision-maker consequence The drawings allow the public to understand the broad engineering concept but not to test the environmental acceptability of each HDD. They do not connect the bore path to the incomplete aquatic baseline, the locations where access was not obtained, the final watercourse condition, the WFD status and objectives, fish habitat, protected species, groundwater or karst. The same drawings that appear precise also reserve the decisive locations and ground response for later investigation.

Requested finding: The Bridge 01-03 drawings establish that three substantial HDD operations are proposed, with three separate bores at each crossing, work compounds, pits, drilling-fluid handling and bore lengths of approximately 99-128 m. They do not provide the crossing-specific geological, hydrogeological and ecological evidence needed to demonstrate that those bores can be completed without deterioration, frac-out, groundwater migration or harm to aquatic receptors. Because final launch and reception positions remain subject to future site investigation and detailed design, the lodged information does not define the final works or their effects with sufficient certainty for consent. This deficiency supports refusal.

33.6 Complete Bridge 01-11 schedule and additional drawing inconsistencies The lodged series identifies ten HDD bridge/watercourse crossings and one crossing, Bridge 09, in which the ducts are proposed within the existing bridge-road construction.

Detailed grounds - source page 100

Bridge Proposed method Stated HDD distance Material observation

01 HDD 99.30 m curve distance Final launch/reception positions deferred to site investigation and detailed design

02 HDD 99.00 m horizontal distance Indicative drill profile; minimum 1.5 m beneath watercourse bed

03 HDD 128.0 m horizontal distance Three bores; relationship with JB17 shown; final working points deferred

04 HDD 99.00 m horizontal / 99.30 m curve Same generic three-bore and minimum- cover approach

05 HDD 71.00 m horizontal / 71.40 m curve Same generic containment and later-design qualification

06 HDD 96.0 m horizontal / 96.3 m curve Same generic three-bore profile and later-design qualification

The plan also appears to label an 88 m HDD crossing; the apparent internal discrepancy requires correction

07 HDD 96.0 m horizontal / 96.3 m curve

08 HDD 139.0 m horizontal / 139.72 m curve Longest stated crossing; same minimum 1.5 m cover criterion

Drawing nevertheless contains a note about later selection of “HDD launch/reception points,” although no HDD launch/reception arrangement is shown

09 Ducting within existing bridge/road structure Not HDD

10 HDD 67.00 m horizontal / 67.88 m curve Three bores, pits and fluid-containment areas; final working points deferred

11 HDD 103.00 m horizontal / 103.26 m curve Three bores and the same indicative/minimum-cover approach

Bridge 09 requires separate assessment because it proposes works within an existing bridge and carriageway. Its drawing shows a minimum road-surface cover criterion and concrete encasement, but does not itself provide the bridge-specific structural assessment, waterproofing/drainage analysis, construction sequencing, traffic arrangement, utility-conflict resolution or bridge-owner approval needed to establish deliverability. The irrelevant HDD note is a document-control defect and calls for confirmation that the correct location-specific method and effects were carried into every environmental chapter.

33.7 Submission-ready public-participation point The public is not required to design an HDD crossing or prove that it will fail. The applicant is required to define the proposed works and provide sufficient site-specific evidence to demonstrate that they

are acceptable. These drawings show the engineering concept, but repeatedly defer the final launch and reception locations until after site investigation and detailed design. They do not provide the underlying ground, groundwater, aquatic and karst evidence needed to test the indicative profiles. The public therefore cannot determine from the lodged drawings what ground will actually be drilled, what land and vegetation the final compounds will occupy, where an inadvertent drilling-fluid release will emerge, or how it will be contained before reaching a watercourse.

34. Site Plan confirms one integrated wind-farm and grid project

Drawing 10955-2010, dated April 2026, shows the 14 turbines, turbine hardstandings, internal access-road system, borrow pits, compounds, substation, internal underground cabling, forestry/felling areas, permanent mast and the point at which the external grid connection leaves the wind-farm site. It is expressly a planning-purpose plan and refers to separate drawings for the mast and surface-water drainage.

The plan demonstrates that the turbines are not isolated points. They depend upon a connected system of excavation, roads, hardstandings, borrow pits, cabling, drainage, compounds, substation infrastructure and external grid connection. Effects from one element are transported through the same peat, surface-water, groundwater, karst, forestry and road systems used by the others.

The plan does not depict the complete approximately 32 km external Grid Connection Route to

Srananagh. It must therefore be read with the grid drawings, crossing schedule, EIAR, NIS and WFD material.

Dividing the documentation or the planning procedures does not divide the physical project or its environmental pathways.

Requested finding: The Site Plan is primary project evidence that the wind farm, onsite electrical

infrastructure, substation and external Grid Connection form one functionally interdependent development. The Commission must assess their complete direct, indirect, cumulative and in-combination effects as one project. The identified gaps in the grid surveys and crossing designs also affect the reliability and deliverability of the wind-farm project, and the relevant officers dealing with both related applications must be notified.

35. The Grid Connection Planning Statement confirms the single project and exposes material contradictions

The Planning Statement is a primary document defining the development for which permission is sought. Its express statements must be placed prominently near the beginning of the submission because they confirm the legal and environmental relationship between the two applications and identify works and pathways that contradict the document's own conclusions of negligible or no significant effect.

35.1 Applicant's express admission: one functionally interdependent project The Planning Statement states:

> “This application, and the Lissinagroagh Wind Farm application are functionally interdependent and constitute a single project.”

It further states that both applications are accompanied by one EIAR and one NIS prepared for the comprehensive proposed project, and directs the Commission to assess both the wind-farm and grid elements together.

Project consequence: The applicant cannot rely on the single-project relationship when advancing climate, energy and policy benefits while treating survey gaps, study-area omissions, WFD screening, ground risk, aquatic effects, public participation and later information as confined to separate applications. A material defect in the shared EIAR or NIS affects both applications. The Commission must place this observation on both files and notify the inspectors and officers dealing with each application.

35.2 The grid is permanent and extends beyond the wind farm The application seeks a ten-year planning permission. The onsite substation and Grid Connection Route will remain permanent and form part of the national grid network. The Planning Statement expressly says the substation and GCR will not be removed at the end of the useful life of the wind farm.

Project consequence: The environmental baseline, land control, maintenance access, emergency response, drainage and long-term effects cannot be treated as temporary construction matters tied only to the operational life of the wind farm. The permanent infrastructure requires a complete and reliable consent-stage assessment of long-term and emergency intervention over its own lifetime.

35.3 Extensive works within and draining to Lough Gill SAC The Planning Statement records:

approximately 920 m of the GCR lies within Lough Gill SAC; trenching includes six existing watercourse crossings within the SAC; a further eight existing watercourse crossings outside the SAC drain into Lough Gill SAC; trenching within 50 m of a watercourse has the potential to cause siltation or contamination; the overall project includes eleven bridge crossings, ten by HDD and one within the bridge deck, together with eight culvert crossings by open trenching; and approximately 10 m of hedgerow and 0.01 ha of mixed broadleaved woodland are to be removed in connection with the temporary launch pit at HDD Site 1.

These are not isolated or negligible work areas. They establish repeated source-pathway-receptor connections along a permanent linear project, including works inside the SAC and connected waters outside it.

35.4 The WFD conclusion is contradicted by the project description The Planning Statement repeats that the complete Grid Connection Route was screened out of detailed WFD assessment because of “limited work areas” and the “short-duration of work near water bodies,” and concludes that the route presents negligible risk of deterioration.

That conclusion is incompatible with the same document's description of:

an approximately 32 km route, including 30.6 km in public roads; ten HDD crossings involving thirty separate bores; one bridge-deck crossing; eight culvert crossings by open trenching; 920 m within Lough Gill SAC; six watercourse crossings within the SAC; eight further crossings draining into the SAC; acknowledged siltation and contamination pathways close to watercourses; and deferred crossing surveys, final HDD working points and confirmatory ecological surveys.

Requested finding: The applicant's own Planning Statement disproves the factual premise used to exclude the GCR from detailed WFD assessment. A 32 km permanent cable project with repeated works within and hydrologically connected to Lough Gill SAC is not established to be negligible merely because each individual workfront moves along the route. The cumulative route-wide and catchment effects were required to be assessed, and the WFD conclusion cannot be relied upon.

35.5 Substation hydrological assertion is unsupported and internally inconsistent The Planning Statement asserts that there are no direct hydrological pathways from the substation to a European site, provided mitigation is implemented. Elsewhere it acknowledges that the substation can affect local drainage and that earthworks, excavation, surface-water runoff and accidental pollution are the primary construction effects.

The lodged substation drawings add 14,231 m^3 of cut, 13,591 m^3 of fill, roads, foundations, drainage components and a nearby water environment, but do not show a complete treatment and outfall pathway. The applicant's wider evidence describes steep, flashy and erosion-prone streams and karstified aquifers. No identified location-specific tracing or complete groundwater investigation demonstrates that the substation water channel and groundwater cannot connect with downstream European sites.

Requested finding: The assertion of no direct hydrological pathway is a conclusion without the complete location-specific surface-water, groundwater, karst and outfall evidence needed to support it. Reliance on mitigation does not establish the absence of a pathway. The contradiction must be resolved before consent and supports refusal.

35.6 Material surveys and designs remain deferred The Planning Statement confirms that:

the Traffic Management Plan will be updated before construction; a confirmatory road-condition survey, including all water crossings, will be conducted before works; confirmatory European Otter surveys and any resulting intervention or mitigation will occur before site clearance and construction; and the bridge drawings leave final HDD launch and reception positions to later site investigation and detailed design.

These matters extend beyond verification of minor detail. They can determine final land take, access, working space, crossing method, ecological constraints, protected-species response and the need for redesign. The public cannot assess a final design or comment on effects that have not yet been identified.

35.7 Land control is not demonstrated The document states that the route occupies public roads, Coillte land and other private land, and identifies off- road HDD works on private pastoral land at Bridges 03 and 08. It does not provide a route-wide schedule identifying every affected owner, the legal interest or consent held, the duration and scope of access, withdrawal provisions, or the additional land needed if later surveys require relocation or expanded mitigation.

The absence is material because final HDD launch and reception points remain subject to later investigation. Permission cannot assume that alternative private land, environmental-monitoring access, emergency access or revised working compounds will be legally and practically available.

35.8 Prominent refusal conclusion from the Planning Statement The Planning Statement asks the Commission to accept the legal and policy benefits of the wind farm and grid as one comprehensive project. The same whole-project approach must apply to defects. Its own description establishes permanent infrastructure, extensive substation cut and fill, ten HDD operations, thirty bores, bridge and culvert works, works inside Lough Gill SAC and additional connected watercourses, while material investigations and final working locations remain deferred. The shared EIAR and NIS do not provide the complete, coherent and independently verifiable evidence required to exclude significant effects. Because the projects are expressly functionally interdependent, the deficiencies affect both applications and permission must be refused.

35.9 The shared EIAR and NIS cannot be accepted selectively The applicant has expressly established the evidential link between the two applications. It states that the wind farm and Grid Connection are functionally interdependent, constitute a single project and are assessed through one EIAR and one NIS. That means the reliability of the grid application depends upon the reliability of the shared whole-project evidence. It is not open to the applicant or decision-maker to rely upon the shared reports for project need, renewable-energy benefits and conclusions of no significant effect while disregarding the material errors, contradictions, omissions and inaccessible locations identified within the same assessment.

The wind-farm assessment fails to establish the complete receiving environment. It omits environmentally connected upland peat and parts of the Dough/Thur Mountains and Saddle Hill setting; confines important conclusions to the applicant's site or Coillte property; does not resolve the complete peat, groundwater, karst, drainage and downslope pathways; relies upon inconsistent peat depths and incomplete ground investigation; and does not incorporate material post-storm evidence. Those omissions directly affect the substation, internal collector cables and the starting point of the statutory Grid Connection.

The grid assessment contains its own independent defects. The route length is inconsistently described; aquatic access and baseline coverage are incomplete; current-layout electrofishing was not undertaken; the complete route was screened out of detailed WFD assessment despite works within and draining to Lough Gill SAC; final HDD working points, road-condition surveys, Otter surveys and material design details remain deferred; and the drawings do not supply the crossing-specific geological,

groundwater, karst and ecological evidence required to validate the proposed methods.

These are not minor drafting defects that officials can accept, correct informally or leave to a contractor. They concern the identity and condition of the receiving environment, the existence of pathways to European sites, the final location and design of works, the effectiveness of mitigation and the evidence required for public participation. Conditions and later method statements cannot convert an unreliable consent-stage baseline into a lawful assessment.

For Appropriate Assessment, the Commission must be able to ascertain, on complete, precise and definitive scientific evidence, that the project will not adversely affect the integrity of the relevant European sites. The identified omissions and contradictions leave unresolved scientific doubt. For Environmental Impact Assessment, the Commission requires a coherent and reliable description of the project, receiving environment, likely significant effects, alternatives and mitigation before reaching its reasoned conclusion. The submitted material does not meet that standard.

Required refusal finding: The applicant has chosen to rely upon one EIAR and one NIS for a single functionally interdependent wind-farm and grid project. The material failures in the wind-farm evidence therefore undermine the grid assessment, while the grid-specific omissions independently prevent the effects of the final route from being determined. The conclusions of no significant effect, no deterioration and no adverse effect on site integrity cannot be relied upon. The evidential deficiency exists at the point of decision and cannot be cured by conditions, later surveys, detailed design, micrositing, contractor method statements or construction-stage monitoring. The Commission cannot lawfully complete the required EIA and AA on the submitted evidence. Permission for the Grid Connection must be refused, and these shared-report failures must be brought formally to the officers and inspectors determining the related wind-farm application.

Photographic Evidence Dough Mountain Access Instability and Storm Damage

The following photographs record the sole access road to the summit of Dough Mountain, steep exposed and eroded ground, pre-existing irregular or displaced ground, road washout, extensive windthrow, clearance works, road repair and the direct downslope setting towards the proposed works around T7 and T8. They must be considered as one evidential sequence.

The photographs establish physical conditions requiring a current, location-specific reassessment. The stated dimensions of the wider windthrow area are the observer's on-site estimate and should be read with the broader photographic sequence and mapping. The photographs dated before Storm Éowyn are relied upon as evidence of pre-existing erosion and ground vulnerability, not as photographs of storm damage.



Plate 1 Pre-storm view of the steep hillside and forestry beside the summit access route.



Plate 2 Irregular and displaced-looking upland ground recorded on Dough Mountain.



Plate 3 Exposed and undercut peat and soil on the steep Dough Mountain slope.



Plate 4 The only road providing access to the summit of Dough Mountain passes immediately below a large steep

exposed soil and peat face, with wet ground and forestry continuing downslope.

If peat, soil, rock, fallen trees or concentrated runoff obstructs this road, access to the summit will be severed. The same road relied upon for construction access, routine monitoring, maintenance and emergency intervention is directly exposed to the identified hazard. No alternative summit access route has been identified by the observer. Loss of this road will prevent personnel, emergency vehicles and containment equipment from reaching the upland works when they are most needed. This access and emergency-response constraint required assessment before consent; it cannot be transferred to construction-stage monitoring or a contractor's later method statement.

This is also the narrow road that construction traffic must use to reach the proposed turbine works on Dough Mountain. It will carry heavy construction plant, excavation and rock-handling traffic, concrete deliveries and the abnormal loads associated with 185 m turbines. Its present width, bends, roadside slopes, drainage and damaged forestry demonstrate that construction access is itself a major engineering and environmental operation. Widening, strengthening, passing arrangements, cut-and-fill, vegetation removal and drainage alteration will further disturb the same steep ground. A collision, road failure, blocked drain, fallen tree, peat movement or slope failure on this confined route will obstruct construction traffic and sever access to the summit.



Plate 5 Road washout, loss of road material and damaged forestry recorded on the summit route in 2025.



Plate 6 Wider view of extensive damaged forestry on the Dough Mountain slope.



Plate 7 Broken and cut trees following clearance works beside the summit road.



Plate 8 Repaired summit road beside the wider storm-damaged forestry area.



Plate 9 Repaired road with broken and leaning trees immediately downslope.



Plate 10 Continuous steep downslope setting from Dough Mountain towards the lower forestry and valley in the direction

of T7 and T8.

Findings

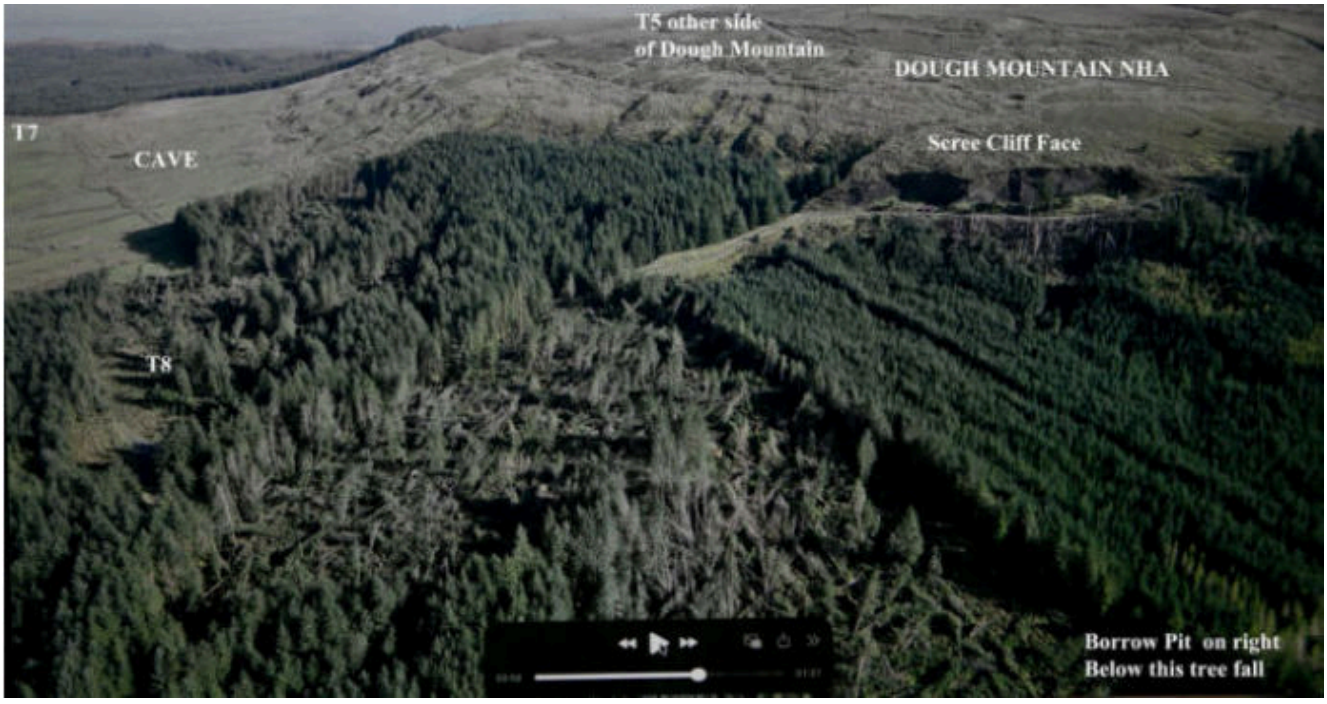
The photographs demonstrate that intense rainfall, drainage concentration, windthrow, exposed ground and road damage already interact within this steep upland environment. The EIAR baseline and peat-stability conclusions do not address this documented change in ground conditions, the road failure and repair, the extensive forestry damage, or the consequences of losing the sole summit access road.

Once movement begins, gravity and drainage will carry peat, soil, rock, construction spoil, sediment and polluted runoff beyond the point of origin. The confined road and steep downslope setting leave no demonstrated containment area and no demonstrated alternative emergency route. Construction-stage inspection will not recover access after the sole road has been blocked or damaged and will not intercept fast-moving material before it enters wet ground, forestry, drainage channels and connected waters.

Required refusal finding: The applicant has not supplied a current post-storm investigation of the slope, forestry, drainage, road formation and proposed works, or a demonstrated emergency-access and containment solution. The findings of low or negligible instability risk cannot be relied upon. This is a fundamental site- suitability deficiency and permission must be refused.

Drone Evidence of the Storm Eowyn Damage Borrow Pit and T8

The following drone photographs were taken on 3 October 2026. The turbine and borrow-pit labels identify proposed locations supplied by the observer. The stated approximately 300 m by 100-150 m extent of windthrow is the observer's on-site estimate. These photographs establish the visible scale and spatial setting of the damage; the applicant's final engineering and environmental assessment remained responsible for verifying precise coordinates, dimensions and pathways.



Drone Plate 2 The exposed cliff or erosion face on Dough Mountain, the sole summit road, extensive Storm Eowyn windthrow and the observer-identified positions of proposed T7, T8, the cave and proposed borrow pit. The proposed

borrow-pit location lies below the steep upland ground and beside the storm-damaged forestry.



Drone Plate 3 The observer-estimated 300 m by approximately 100-150 m Storm Eowyn windthrow corridor, with the proposed borrow-pit location to the left and proposed T8 to the right. The damage occupies the terrain between major

proposed works.



Drone Plate 4 Extensive windthrow extending downslope through the forestry immediately below the observer-identified

proposed borrow-pit location. The damage remained clearly visible on 3 October 2026, Storm Eowyn in January 2025.

Finding

The drone evidence materially strengthens the documented relationship between the proposed borrow pit, proposed T7 and T8, the cave, swallow hole, steep Dough Mountain ground, sole summit road and extensive Storm Eowyn windthrow. The storm damage is not remote from the proposed development. It extends through the forestry beside and downslope of the proposed borrow-pit area and towards proposed T8. Excavation, rock breaking or blasting, tree removal, road construction and drainage alteration will occur within this already damaged and environmentally connected landscape.

No disclosed post-storm geotechnical, peat-stability, forestry, drainage, groundwater or borrow-pit reassessment addresses the complete damaged area and its relationship with T7, T8, the cave, swallow hole and sole summit road. The low or negligible instability classification cannot be reconciled with this current physical evidence without a complete new investigation. The omission affects borrow-pit feasibility, turbine and road stability, blasting consequences, karst and groundwater pathways, emergency access, containment and downstream pollution risk. These matters were required to be resolved before consent and support refusal.

Part IV — Procedural Record and Prescribed-Body Requirements

Pre-application consultation chronology

Date	Official record	Significance
14 July 2025	Pre-application consultation requested.	Applicant commenced the Grid process while the Wind Farm was still developing.
27 January 2026	First meeting; Commission sought clarity; follow-up agreed.	The project was not sufficiently clear at the first meeting.
30 March 2026	Second meeting described as overview; further in-depth discussion assigned to a next meeting.	No third meeting record has been identified.
28 May 2026	Applicant requested closure and supplied detailed description and layout.	Important final details arrived at closure rather than through the promised detailed discussion.
3 June 2026	Inspector recommended SID status.	Report addressed statutory classification, not environmental acceptability.
June 2026	Commission closed consultation and directed application under s.182A.	The Direction was not approval of route, EIAR, NIS or mitigation.
August 2026	Final Grid application lodged.	Later details must be tested against what earlier Wind Farm participants and bodies received.

Requirements known to the applicant

Body	Recorded requirement	Failure now relevant
Leitrim County Council	Complete direct/indirect and cumulative assessment; materials, waste, peat, landslide, seasonal hydrology, roads, haul routes and Storm Éowyn.	No combined Grid/Wind Farm mass balance or haul route; omitted upland source areas and post-storm baseline.
NPWS/DAU	Peat instability and bog-slide risk below Dough/Thur NHA; hydrological links to Lough Gill and Lough Melvin; Hen Harrier and Whooper Swan.	Restricted Study Area, incomplete pathways and no dedicated Grid bird survey.
GSI	Complex karst, dolines, swallow holes, springs and effects from roads, traffic, Grid works and drainage alteration.	Visible-feature avoidance and generic mapping substituted for complete location- specific investigation.
IFI	Electrofishing all waters; quantitative data; full upstream/downstream/ control surveys; monitoring and landslide/vibration assessment.	No current-layout electrofishing; access gaps; partial water-quality coverage; incomplete final-crossing evidence.
Department of Transport	Road stability, peat/bog ramparts, exact chambers/joint bays, bridges/culverts and variable ground.	Generic details and deferred surveys do not identify the final location-specific design.
TII	Clear haul routes, traffic volumes, road capacity, alternatives and differential settlement.	Grid-to-borrow-pit haul route and combined construction traffic remain undefined.
OPW	Flood assessment across sources, pathways and receptors.	Known recurring flood locations and unmapped headwaters are not resolved by undergrounding.

Body	Recorded requirement	Failure now relevant
Uisce Éireann	Protection of drinking-water catchments and assets.	Local wells, water mains and protected drinking-water receptors lack a complete route-specific baseline.

Part V — Final Grounds for Refusal and Requested Determination

The applications do not contain one consistent and complete description of the functionally interdependent project. The Grid relies on Wind Farm borrow pits and infrastructure whose capacity and environmental effects were assessed without the complete Grid material stream. The EIAR baseline excludes connected Dough Mountain and Saddle Hill peat, karst, drainage, groundwater and downstream pathways. The NIS cannot exclude adverse effects on European sites where the source–pathway–receptor evidence is incomplete and mitigation remains deferred. The Grid was screened out of detailed WFD assessment without a complete route-wide and cumulative analysis.

Aquatic, ornithological, bat, ground, utility, land-control and crossing investigations remain incomplete at consent stage. Generic drawings and contractor-developed method statements do not demonstrate that the approved locations are suitable. Monitoring and emergency arrangements lack continuous coverage, measurable triggers, secured off-site access and permanent post-decommissioning responsibility. Effective public participation was prevented by the separation and timing of the applications and the later disclosure of material whole-project information.

The Commission is requested to refuse permission for the Grid Connection. It is further requested to cross-notify the Wind Farm Inspector and case team, place all later Grid material on the related file, notify Leitrim County Council and relevant prescribed bodies of the combined borrow-pit and material- management issue, and provide the public an effective opportunity to address any subsequent significant information before either decision is made.

Part D | Northern Ireland correspondence

Fermanagh and Omagh District Council response and TOBIN notification.

Original source dates and document pagination are retained.

Outlook

Lissinagroagh Wind Farm

From Paul McDermott <paul.mcdermott@fermanaghomagh.com>
Date Thu 6/25/2026 8:01 AM
To SIDS <sids@pleanala.ie>
Cc Planning <planning@fermanaghomagh.com>

2 attachments (756 KB)
260617-Planning-PaperH-App1.pdf; FODC - Final response.pdf;

You don't often get email from paul.mcdermott@fermanaghomagh.com. Learn why this is important

Caution: This is an **External Email** and may have malicious content. Please take care when clicking links or opening attachments. When in doubt, contact the ICT Helpdesk.

Hi,

Fermanagh and Omagh District has been notified by TOBIN of the above planning application (attached) and invited to submit comments to An Coimisiún Pleanála before the 10th July 2026.

The matter was discussed at the June 2026 Planning Committee meeting and the attached response was agreed for submission.

Please confirm safe receipt.

Regards
Paul McDermott MRTPI
Lead Planner

Fermanagh & Omagh District Council
Comhairle Ceantair Fhear Manach agus na hÓmaí

10 YEAR ANNIVERSARY
10 Years, One Voice



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Fermanagh & Omagh District Council
Comhairle Ceantair Fhear Manach agus na hÓmaí

Final Response in relation to Lissinagroagh Wind Farm, Co. Leitrim

General

The Council welcomes the opportunity to comment on this proposal. The information, whilst substantial, would appear to be all available in an easily accessible and user friendly format. This ensures consultation with the public and FODC is meaningful and can reduce delays.

Community Benefits

FODC would highlight the importance of including mechanisms within the proposed project to ensure community benefit for neighbouring communities.

Renewables

The Council's Local Development Plan 2030: Plan Strategy, explains that the Council aims to support a diverse range of renewable energy development whilst at the same time taking into consideration environmental, landscape, visual and amenity impacts.

Climate change

The proposed wind farm will contribute to national and regional climate and energy objectives by supporting the transition to low-carbon electricity generation and reducing reliance on imported fossil fuels. ROI is currently off track to meet its 2030 greenhouse gas reduction targets and faces a significant shortfall in renewable energy capacity, particularly in onshore wind.

Developments such as this are therefore important in helping to increase renewable energy supply, improve energy security, and support long-term price stability. The Council notes the importance of clearly demonstrating the project's overall carbon benefits, including emissions associated with construction, and how it aligns with wider climate and energy policy objectives.

Water Environment, Peat and Ecology

The Council notes the potential for sedimentation and contamination of surface waters during both the construction and operational phases of the proposed development. While the project lies outside the Council's area, it should be clearly demonstrated that runoff and potential pollutants will be effectively managed to ensure no adverse effects on downstream European sites that may influence the wider FODC area, including Lough Melvin SAC and Pettigoe Plateau SPA, as well as Areas of Special Scientific Interest (ASSIs), which carry protections comparable to Natural Heritage Areas and proposed Natural Heritage Areas (NHAs and pNHAs).

The Council also notes the potential for disturbance to protected habitats and species, as well as collision risk for certain bird species. It is important that careful consideration is given to how these risks can be avoided or reduced, particularly where there may be indirect or transboundary ecological effects relevant to this Council area.

The potential spread of invasive species along the grid connection route is noted as a concern. The Council considers it important that appropriate measures are in place to prevent this, particularly where pathways to sensitive sites have been identified. Overall, robust mitigation will be important to safeguard water quality, habitats and species, including those that may have implications for the FODC area.

Visual impacts

The Council notes that the proposed development is situated within a sensitive upland landscape, in close proximity to several designated scenic and protected areas. A number of supporting landscape studies were completed as part of the FODC plan making process, these have been provided previously. The Council's Wind Energy Strategy, advises that both the Garrison Lowlands and the Lough MacNean Valley have limited to very limited capacity for wind energy development.

It is important that there is consistency in approach to landscape capacity, along the boundary with FODC and Leitrim. Within FODC the Garrison Lowlands, characterised by an open landscape that contributes significantly to the setting of Lough Melvin and views across it, has only limited capacity, primarily for small-scale developments associated with farms and individual properties. Similarly, the Lough MacNean Valley, valued for its scenic quality and lowland character, is identified as having very limited capacity, with only minimal potential for small-scale or carefully sited single turbines in less sensitive locations.

These two landscape areas are the most likely to be affected by the proposal and are highly valued for their scenic quality, strong sense of place, and importance for tourism and recreation.

FODC would highlight that there may be potential visual amenity impacts within FODC area due to the scale and magnitude of the proposed windfarm, which would significantly alter the landscape. A windfarm on this site, of the scale and magnitude proposed will present a very significant change to the landscape. It is critical that careful consideration is given to long range views and the potential effects on skylines, ridgelines and key views. Cumulative impacts are also material and should be carefully considered.

Tourism

The Council recognises that tourism in the wider region depends heavily on attractive scenery and high landscape quality. Large-scale structures have the potential to alter the character of long-distance views that are valued by visitors. Lough Melvin, Garrison and Cuilcagh Mountain are key scenic assets and important tourism

destinations within the area, and this proposal needs to carefully consider the impacts on these tourism assets.

The proposal should consider whether such changes could influence visitor behaviour or affect the overall perception and image of the area. A balanced judgement is required, taking into account both the economic benefits of renewable energy and any potential impacts on the tourism economy. In this context, the Council's Visitor Experience Development Plan for the Fermanagh Lakelands area, is material. It seeks to promote the region as a high-quality, sustainable tourism destination centred on its natural landscape, including flagship attractions such as Cuilcagh Mountain.

The Council considers tourism to be an important material consideration.

Residential Amenity

The EIA provides very limited information on the potential impacts on residential amenity for dwellings within this Council area. When assessing wind turbine proposals, the Council typically considers dwellings located at least ten times the rotor diameter from the turbines. While no dwellings in FODC fall within that distance, the EIA should still include consideration of residential units within FODC.

Nonetheless, the wind farm has the potential to adversely affect the amenity of nearby third parties through a range of factors, including traffic, noise, dust, vibration, and general disturbance. The potential impact on residents within FODC is an important material consideration to the Council. It is important that the amenity of these residential properties is fully considered within all supporting assessments, with appropriate mitigation measures identified to minimise any potential effects.

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Our Ref: 10955

12th May 2026

Fermanagh and Omagh District Council
The Grange,
Mountjoy Road,
Lisnamallard,
Omagh,
Tyrone BT79 7BL

Digital Copy provided to planning@fermanaghomagh.com

Matter: Notification in relation to proposed development that is likely to have significant effects on the environment of a Member State of the European Union or a state that is a party to the Transboundary Convention (the United Nations Economic Commission for Europe Convention on Environmental Impact Assessment in a Transboundary Context, done at Espoo (Finland), on 25 February 1991) – Lissinagroagh Wind Farm

Dear Sir/Madam,

I write to inform you that FuturEnergy Lissinagroagh Designated Activity Company (the "**Applicant**") intends to apply to An Coimisiún Pleanála (the "**Commission**") under Section 37E of the Planning and Development Act 2000 (as amended) for permission for the proposed renewable energy development of a wind farm on a site area of 389 ha in the townlands of Boleyboy, Cashelaveela, Cherrybrook, Coolodonnell, Faughary, Killea, Lissinagroagh, Lisdarush, Lugasnaghta, Raheelin, Shasmore, Tawnyfeacle, and Tullyskeherny, Co. Leitrim.

The Proposed Development for which permission is sought will comprise:

- Fourteen (14) wind turbines with a blade tip height range of 180 m to 185 m inclusive, a rotor diameter range from 149 m to 163 m inclusive, a hub height range from 101 m to 110.5 m inclusive, a minimum ground clearance of 22 m, and all associated foundations, hardstanding and assembly areas;
- A permanent meteorological mast with a height of 100 m, with a lightning finial extending above the mast;
- Modifications to an existing site access on the L61801 local road in the townland of Faughary in the west of the site, to be used as a permanent access during construction and operation;
- A new temporary access on the L6184 local road in the townland of Cherrybrook for use by turbine delivery vehicles during construction only, and subsequent reinstatement;
- Modifications to an existing site access on the L61844 local road in the townland of Lissinagroagh in the southeast of the site, to be used as a temporary access during construction phase only;
- Approximately 7.95 km of new internal access tracks to include passing bays and associated drainage;
- Upgrade of approximately 8.35 km of existing access tracks, to include passing bays and associated drainage;

Directors: **M. Shelly** (Chairman) **C. McGovern** (Managing Director) **E. Connaughton** (Company Secretary) **B. Downes** **D. Grehan** **M. McDonnell** **J. McGrath** **B. Carroll** **S. Tinnelly** **J. O'Flaherty**

Technical Directors: **B. Gallagher** **B. Heaney** **C. Kelly** **T. Mackey** **D. Meade** **O. Fitzpatrick** **P. Cloonan** **P. Cunningham**

Associate Directors: **M. Casey** **E. Fenton** **L. Kennedy** **P. O'Connor** **B. Rudden** **M. Geraghty** **S. Ryan** **R. Murtagh** **K. Gallagher**

Co. Reg. No. 42654 – Registered Office: Fairgreen House, Fairgreen Road, Galway H91 AXK8, Ireland

- Temporary and permanent drainage and sediment control systems;
- Ten (10) clear span bridges and one (1) existing culvert extension at watercourse crossings by access tracks;
- Three (3) borrow pits with a total available area of 63,352 m2 for temporary use during construction. The borrow pits will subsequently be used for storage of excavated material;
- Two (2) temporary construction compounds each on an area of 9,100 m2 to contain site offices, storage containers, bunded fuel storage, waste storage, parking areas and security fencing;
- Seven (7) permanent controlled access points on the L61801 and L6184 Local Roads in the townlands of Faughary and Boleyboy to facilitate turbine delivery and construction works which will remain in place after the construction period;
- A temporary crossing of unnamed local road in the townland of Cherrybrook to facilitate turbine delivery vehicles during construction only;
- All associated underground electrical and communications cabling connecting the wind turbines to the on-site substation (the substation is subject to a separate planning application, see details below);
- All related site works and ancillary development including landscaping and soil excavation;
- Biodiversity enhancement areas (218.5 ha) to provide nesting and foraging habitat for birds and other land improvements; and
- Ancillary forestry felling to facilitate construction and operation of the proposed project.

A separate application to obtain approval for a proposed grid connection and substation will be submitted to An Coimisiún Pleanála. This application, and the proposed grid connection application are functionally interdependent and constitute a single project. The proposed grid connection application will seek approval for a 110kV substation and grid connection within the townlands of Curraghfore, Skreeny, Faughary, Amorset, Clooneen, Milltown, Cornastauk, Srabrick, Cloonaquin, Carrigeencor, Boihy, Aghameelta, Kilcoosy, Corrudda, Cleen, Tully, Killeen, Killanummery, Cleighran, Fawn, Drumahaire, Drumlease, and Carrowcrin Co. Leitrim and Lavally, Drumee, and Ballysumaghan, Co. Sligo.

A Turbine Delivery Route (TDR) along which temporary accommodations may be required are considered in the accompanying EIAR and NIS, and these accommodations are located at the following townlands: Cherrybrook, Cornastauk, Diffreen, Donagh Beg, Donagh More, Knocknaclassagh, Manorhamilton, Moneenshinnagh, Lugnafaughery, Sracreeghan and Meenaphuill (County Leitrim), Barroe, Ballytivnan, Cartron, Cloontyprocklis, Doonally, Drumcliff South, Drumkilsellagh, Grange, Rathquarter, Tully, Willowbrook (County Sligo), and Aighan, Aghayeevoge, Ballymagowan, Beaugreen Glebe, Bruckless, Cashelreagh Glebe, Clarcarricknagun, Coolcholly, Darney, Doonan, Drumlonagher, Dunkineely, Finner, Killybegs, Magheracar, Mullans, Tullyearl, Tullygallan (County Donegal).

A 35-year operational life from the date of full commissioning of the entire wind farm is being sought for all works, and the subsequent decommissioning. The onsite substation and grid connection forming part of the separate grid connection application will remain permanent infrastructure and form part of the national grid network.

Certain details of the proposed development are unconfirmed in this planning application and an opinion on unconfirmed details from the Commission Case Reference: ACP Ref. 323910-25) pursuant to section 37CD of the Planning and Development Act 2000 (as amended) accompanies the planning application. The details unconfirmed in this application are the turbine tip height, rotor diameter and hub height. The range of parameters under which the turbine dimensions will fall are specified above.

This planning application is accompanied by an Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) prepared in respect of the construction, operation and decommissioning of the Proposed Development, the grid connection and TDR accommodation areas.

A copy of the planning application, including the EIAR and NIS can be viewed on the following website: www.lissinagroaghplanning.ie

The Proposed Development is likely to have significant effects on the environment of Northern Ireland.

In considering this application, the Commission can decide to:

a) (i) grant the permission, or

(ii) make such modifications to the proposed development as it specifies in its permission and grant permission in respect of the proposed development as so modified, or

(iii) grant permission in respect of part of the proposed development with or without specified modifications of it of the foregoing kind and any of the above decisions may be subject to or without conditions, or

(b) refuse to grant permission.

Submissions or observations may be made in writing to the Commission at 64 Marlborough Street, Dublin 1, D01 V902 or online on the Commission's website www.pleanala.ie.

Submissions or observations may be made between 21st May 2026 and 5.30pm on the 10th July 2026.

Any enquiries relating to the application process should be directed to the Strategic Infrastructure Section of the Commission (telephone no. 01-8588100).

Yours faithfully,



_____

Clare O'Doherty

Assistant Project Manager

For and on behalf of TOBIN (agent)

Clare.odoherty@tobin.ie

+353 (01) 803 0401