The Grid Connection
And Lissinagroagh Windfarm

Observation Submission
To An Coimisiún Pleanála
Date: 12 October 2026
Submitted by Ciarán Rock on behalf of Kiltyclogher Community Council
Rossinver Road
Kiltyclogher
Co. Leitrim
Eircode F91Y2N3

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, Dromahair, Drumlease and Carrowcrin.
County Sligo: Lavally, Drumee and Ballysumaghan.

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1. INTRODUCTION

Kiltyclogher Community Council respectfully makes this submission and objection in relation to the proposed Lissinagroagh Grid Connection.

The Kiltyclogher Community Council considers that the proposed approximately 32 km Grid Connection, together with the associated substation, control building, telecommunications infrastructure, underground cabling, access works, HDD crossings, culvert and bridge works and associated construction activity, must be assessed in the context of the **complete Lissinagroagh Wind Farm and Grid Connection project**.

The Council's concerns extend beyond the immediate physical footprint of the proposed Grid Connection.

They include:

- Inadequacy of public consultation
- protection of European Sites, including SACs and SPAs;
- protection of rivers, lakes and groundwater;
- protection of drinking-water resources;
- karst and underground hydrological connectivity;

- peat stability and downstream sediment risk;
- aquatic ecology and fish populations;
- landscape and visual amenity;
- tourism and the rural visitor economy;
- walking, cycling, landscape trails and outdoor recreation;
- construction traffic and road safety;
- community amenity;
- adequacy of baseline environmental information; and
- the cumulative effects of the Wind Farm and Grid Connection.

The Kiltyclogher Community Council considers that these issues are interconnected and cannot properly be assessed by treating the Grid Connection as an environmentally independent project.

The windfarm is the primary objective of the project. The proposed grid connection serves that development and would not be required if the windfarm was not built.

The Kiltyclogher Community Council accordingly requests that permission be refused. We also request

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2. THE WIND FARM AND GRID CONNECTION ARE ONE FUNCTIONALLY INTERDEPENDENT PROJECT

The proposed Wind Farm and Grid Connection are functionally interdependent.

The Grid Connection is required to export the electricity generated by the Wind Farm. The Wind Farm, in turn, is the reason for the Grid Connection.

The Council therefore considers that the environmental effects of the two components must be understood together.

This is not an argument that separate planning applications are inherently unlawful. Rather, the Council submits that **separate applications must not result in the environmental assessment of the overall project being artificially fragmented**.

The High Court's decision in **O'Grianna & Others v An Bord Pleanála [2014] IEHC 632** is directly relevant. In that case, the Court held that the connection of a wind farm to the national grid was an integral part of the overall development and that the environmental assessment could not lawfully consider the wind farm while omitting the environmental effects of the grid connection.

The significance of *O'Grianna* is not that every wind farm and every grid connection must necessarily be contained in one planning application. The important principle is that **where the infrastructure is an integral and functionally necessary part of the project, the environmental assessment must address the project as a whole**.

The Board itself has subsequently recognised the relevance of *O'Grianna* in wind-farm/grid-connection cases, including requiring information sufficient to enable assessment of the overall proposal and cumulative impacts.

The same principle is reflected more generally in EU environmental law: the identification of the project for EIA purposes cannot be manipulated so that

significant environmental effects escape assessment through artificial fragmentation. The Courts Service's current summary of the relevant EU jurisprudence identifies **functional interdependence, geographical proximity and similarity** as relevant considerations in identifying the project.

The Council therefore submits that:

1. the Wind Farm and Grid Connection should be treated as components of one overall development for environmental assessment purposes;
2. the cumulative environmental effects of both must be properly assessed;
3. the Board should not rely upon separate applications to avoid or dilute assessment of cumulative effects; and
4. the public should be able to understand the environmental consequences of the complete development before the Board reaches its decision.

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3. PROJECT SPLITTING IS PARTICULARLY IMPORTANT IN THIS CASE

The project-splitting issue is especially important here because the Grid Connection is a substantial

The application involves an approximately 32 km route, predominantly within public-road corridors, together with:

- multiple watercourse crossings;
- HDD works;
- culvert works;
- excavation;
- joint bays;
- temporary working areas;
- construction traffic;
- substation infrastructure;
- control infrastructure;
- telecommunications infrastructure; and
- associated drainage and environmental mitigation.

The Grid Connection is therefore not a minor ancillary detail.

The source material identifies approximately **920 metres of the Grid Connection within Lough Gill SAC**, together with six watercourse crossings within that SAC and additional crossings outside the SAC which drain towards it.

The applicant's own environmental material treats the Wind Farm, substation, approximately 32 km Grid Connection Route and associated works as the **Proposed Project** for purposes of the NIS. The NIS identifies 13 European Sites for which adverse effects could not be excluded without mitigation, including Lough Gill SAC and Lough Melvin SAC.

That is highly significant.The Council therefore submits that the Board should not permit the administrative separation of the planning applications to result in environmental separation of the project.

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4. HABITATS DIRECTIVE — SAC AND SPA PROTECTION

The proposed development engages the protection afforded to European Sites under **Council Directive 92/43/EEC — the Habitats Directive**, together with the **Birds Directive 2009/147/EC**.

Article 6 of the Habitats Directive provides a central protection for Natura 2000 sites.

Article 6(3) requires consideration of plans or projects likely to have a significant effect on a European Site, individually or in combination with other plans or projects.

The European Commission's Article 6 guidance confirms that cumulative effects must be considered and that assessment must follow potential pathways, including water pathways, rather than simply relying upon an application's physical boundary.

This is directly relevant to the present proposal.

The source material identifies:

- Lough Gill SAC;
- Lough Melvin SAC;
- other European Sites potentially affected by the integrated project;
- approximately 920 m of the Grid Connection within Lough Gill SAC;
- six watercourse crossings within that SAC; and
- additional crossings draining towards the SAC.

The Council therefore considers that the Board must assess the complete source–pathway–receptor relationship.

A planning boundary is not a hydrological boundary.

A cable trench does not stop groundwater movement.

A peat body does not stop at an ownership boundary.

A river does not stop at a planning application boundary.

The Appropriate Assessment must therefore follow the actual environmental pathways.

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5. The **Appropriate Assessment (AA)** under the **EU Habitats Directive (92/43/EEC) have gaps and are insubstantial.**

Points included:

 Incomplete current-layout information: The final turbine, access track and associated infrastructure layout within the Lissinagroagh Wind Farm site, including areas draining towards the Cornavannoge catchment and tributaries of the Owenmore, Owenbeg and Ballagh Rivers.
 Watercourse crossing constraints: Proposed access track and infrastructure crossings of watercourses within the wind farm site, particularly where drainage pathways connect to tributaries of the Owenmore River, the Owenbeg River and the Ballagh River. Individual

inaccessible crossing locations require confirmation against the relevant site drawings and survey records.
 Limitations in fish survey coverage: Watercourses draining towards the Owenmore River and Lough Gill Special Area of Conservation (SAC), the Owenbeg River and Lough Gill SAC, and the Ballagh River and Lough Melvin SAC, where aquatic connectivity and potential effects on protected fish species require consideration.
 Partial macroinvertebrate survey coverage: Watercourses and tributaries within the proposed development's hydrological zone of influence, including those draining towards Lough Gill SAC and Lough Melvin SAC, where further survey coverage needs be required to establish a comprehensive aquatic ecological baseline.
 Unresolved groundwater pathways: Groundwater and surface-water interactions within the proposed wind farm site and its downstream catchments, including potential connections to watercourses and sensitive ecological receptors associated with Lough Gill SAC and Lough Melvin SAC.
 Uncertainty concerning karst connectivity: Potential subsurface groundwater connections between the development footprint, underlying geological features and groundwater-dependent ecological receptors, requiring verification through the detailed hydrogeological and karst assessments.

 Reliance on future verification, detailed design and monitoring: Outstanding confirmation of watercourse crossing locations, drainage pathways, aquatic survey coverage and groundwater connectivity throughout the wind farm site and associated infrastructure areas, including the final access track and grid connection arrangements.

The NIS identifies European Sites where adverse effects could not be excluded without mitigation and then relies upon mitigation, future verification, detailed design and monitoring in reaching its conclusions.

The Kiltyclogher Community Council considers this material uncertainty particularly important because Appropriate Assessment is concerned with the protection of the **integrity of European Sites**.

The European Commission's Article 6 guidance states that where likely significant effects cannot be excluded beyond reasonable doubt, Appropriate Assessment is required, and that sufficient information must exist to enable the implications for the site to be properly assessed.

The Council therefore submits that fundamental evidential gaps cannot simply be postponed until construction.

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6. LOUGH GILL SAC — A CRITICAL RECEPTOR

The Kiltyclogher community Council places particular emphasis on **Lough Gill SAC**.

The proposed Grid Connection physically enters Lough Gill SAC for approximately 920 metres. The source material identifies six watercourse crossings within that section and eight additional crossings outside the SAC which drain towards it.

The Council is therefore concerned that the assessment of the Grid Connection as a series of individual work fronts understates the significance of the complete route.

The applicant's assertion that individual work areas present limited or negligible risk must be examined against the actual characteristics of the project:

- approximately 32 km of permanent underground cable;

- repeated excavation;
- multiple watercourse crossings;
- HDD operations;
- culvert works;
- drainage;
- construction traffic;
- peat and soil disturbance;
- potential sediment mobilisation; and
- direct and indirect connections to Lough Gill SAC.

The Council considers that the cumulative and route-wide effects cannot properly be characterised as negligible simply because the construction activity is geographically distributed.

The source material specifically identifies this issue and notes that the Grid Connection was excluded from detailed WFD assessment despite the works within and draining towards Lough Gill SAC.

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7. LOUGH GILL — DRINKING WATER

Kiltyclogher community council wishes to underline the fact that **Lough Gill provides drinking water for the village and local area**.

This gives the protection of the Lough Gill catchment an additional and fundamental public-interest dimension.

Lough Gill is therefore not merely:

- a European Site;
- an ecological receptor; or
- a landscape feature.

*It is also to be understood as a **drinking-water resource**.*

Directive **(EU) 2020/2184 concerning the quality of water intended for human consumption** is particularly relevant. Article 8 requires risk assessment and risk management of catchment areas for abstraction points used for water intended for human consumption. It specifically addresses catchment characterisation, land use, runoff and recharge processes, hazards and hazardous events, risks to drinking-water quality and appropriate monitoring.

The Council considers that this principle is highly relevant where the proposed development has potential pathways towards Lough Gill.

The assessment should therefore consider foreseeable hazards including:

- peat failure;
- sediment release;

- construction runoff;
- accidental fuel or chemical pollution;
- HDD-related releases;
- excavation;
- rock breaking;
- drainage alteration;
- contaminated water;
- groundwater interception; and
- mobilisation through karst.

The Council submits that protection of a drinking-water catchment requires more than an assumption that standard construction controls will operate perfectly.

The potential hazards and pathways must be properly understood **before consent**.

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8. WATER FRAMEWORK DIRECTIVE

The Kiltyclogher community Council further relies upon the requirements and objectives of **Directive 2000/60/EC — the Water Framework Directive**.

Article 4 establishes environmental objectives for water bodies, including the obligation to implement measures necessary to prevent deterioration of the status of surface waters.

The Court of Justice has confirmed the significance of the non-deterioration requirement and held that deterioration can occur where the status of at least one relevant quality element falls by one class, subject to the Directive's provisions and derogations.

The Council therefore considers that the Board must be satisfied that the complete project will not cause deterioration of relevant water bodies or jeopardise the attainment of the applicable environmental objectives.

This issue is particularly important given the projects:

- length;
- repeated watercourse crossings;
- drainage works;
- HDD works;
- excavation;
- peat disturbance;
- potential sediment mobilisation; and
- potential groundwater interaction.

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9. OWENMORE RIVER AND Lough Gill — KARST AND GROUNDWATER

The source material identifies a **Regionally Important Aquifer — Karstified (conduit)**, widespread fractured limestone, caves, swallow holes and numerous possible karst features.

The reported Polldough dye trace demonstrates an underground connection of approximately one kilometre to Mt Dough Stream.

The Council does **not** assert that this dye trace proves a direct connection to the Owenmore River or Lough Gill.

Its importance is different.

It demonstrates that:

1. underground transport over substantial distances occurs in the local karst system;
2. water entering the subsurface at one location can emerge elsewhere; and
3. surface topography and planning boundaries cannot safely be assumed to define the limits of groundwater movement.

The source material further identifies the absence of an equivalent dye-tracing or comprehensive groundwater-pathway investigation demonstrating the fate of water and contaminants from the southern and western works towards the Owenmore/Lough Gill system.

This is a material deficiency.

The Council considers that the Board cannot confidently exclude impacts on Lough Gill without first understanding the relevant groundwater pathways.

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10. Threat to Kiltyclogher's Tourism-Based Economy, Natural Environment, Heritage and Long-Term Community Survival.

Kiltyclogher Community Council objects to the proposed Grid Connection Route (GCR) and associated substation on the grounds that the industrial infrastructure required to support the large wind energy development (Lissinagroagh Windfarm Development) must be assessed not only in terms of its engineering function, but also in terms of its potential consequences for the community, its landscape, its heritage and its economic future.

Kiltyclogher is a rural community whose vitality and continued viability are closely linked to the quality of its natural environment, its rivers and lakes, its scenic landscape, its heritage and the visitors these assets attract to its Holiday Centre. These are not incidental amenities. They form part of the identity of the area and underpin its appeal as a place to visit, explore and experience the rural landscape. Tourism and the associated visitor economy can be particularly important to the survival of a small rural village, supporting local businesses, employment, services and community life.

The Kiltyclogher council is deeply concerned that introducing industrial infrastructure of this scale into the surrounding landscape could compromise the very qualities on which this local economy depends. The proposed grid connection and substation

must therefore be considered in the context of the combined development they serve, including its cumulative visual, environmental, cultural and economic effects.

The potential consequences extend beyond the physical footprint of the substation or the individual sections of the grid route. Visitors experience a connected landscape: its views, quiet roads, rivers, lakes, walking routes, heritage features and sense of place. The effects of industrial structures, construction activity, traffic, noise, lighting, landscape change or any deterioration in water quality may extend beyond application boundaries and affect the wider visitor experience. The Council asks that these risks be assessed using appropriate evidence and a study area that reflects the landscape and visitor destinations potentially affected.

The Kiltyclogher council is particularly concerned about the vulnerability of the area's rivers and lakes. Their perceived and actual quality is an important part of the local environment and tourism appeal. Any construction-related pollution, sediment release, fuel spill or other deterioration in water quality could damage aquatic habitats and undermine public confidence in the condition of these natural assets. The Council does not suggest that such damage is inevitable; it submits that the potential consequences are sufficiently serious to require a rigorous, site-specific assessment and credible safeguards before permission is granted.

The Kiltyclogher council also emphasises the importance of Kiltyclogher's heritage, including sites and features identified by the Kiltyclogher Heritage Centre team, and the wider cultural and natural landscape around Dough Mountain. Heritage is not simply a collection of isolated recorded monuments. It is connected to the landscape, local history, community knowledge and the experience of the place as a whole. The potential for construction and industrial infrastructure to affect the setting, appreciation or preservation of heritage assets must be properly examined, including the possibility of previously unrecorded features being encountered during works.

For a small rural community, the risk is not limited to one view or one visitor attraction. It is the cumulative effect of changes that may diminish the distinctiveness and environmental quality that make the area worth visiting. If the landscape, waterways, tranquillity and heritage that sustain tourism are compromised, local businesses and livelihoods may be affected, opportunities for future tourism development may be reduced, and the long-term resilience of the village could be weakened. These outcomes could place further pressure on a community already dependent on maintaining its natural and cultural assets.

The Kiltyclogher council recognises that renewable energy infrastructure serves wider energy objectives. However, those objectives do not remove the requirement to assess the local consequences of the infrastructure used to connect and support a wind farm. The Council's position is that the benefits claimed for the wider project must be considered alongside the environmental, social and economic risks borne by the host community. A rural community should not be expected to accept potentially lasting harm to the natural environment, heritage and tourism assets on which its future depends without a complete and credible assessment of those consequences.

The Kiltyclogher Community Council therefore requests that An Coimisiún Pleanála:

1. Assess the grid connection and substation as part of the overall functionally related wind energy development when evaluating landscape, environmental, heritage and cumulative effects.

2. Require a robust assessment of the potential impacts on tourism, local businesses, visitor experiences, walking and recreational routes, scenic views, tranquillity and the wider landscape setting.
3. Assess the potential consequences for rivers, lakes and other natural assets that contribute to the area's tourism appeal, including risks arising from construction drainage, sediment, accidental spills and other pollution pathways.
4. Assess direct and indirect effects on known heritage assets, features identified through local heritage work, and the setting and cultural landscape of Kiltyclogher and Dough Mountain.
5. Explain how the applicant has evaluated the potential long-term implications for the local visitor economy and community viability, rather than limiting its assessment to the immediate construction footprint.
6. Ensure that the decision gives proper weight to the protection of the natural and cultural assets that sustain this rural community and considers whether the identified risks can genuinely be avoided or acceptably mitigated.

Kiltyclogher Community Council considers that the potential compromise of the area's rivers, lakes, scenery, heritage and tourism appeal represents a serious concern for the future of the community. The issue is not simply whether the infrastructure can be built, but whether its location and scale are compatible with protecting the environmental and cultural foundations on which Kiltyclogher's continued existence as a living rural community depends.

The Kiltyclogher council therefore asks An Coimisiún Pleanála to give this concern substantive consideration in determining the application and, if the impacts cannot be adequately assessed or acceptably avoided and mitigated, to outright refuse permission.

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11. PEAT STABILITY AND DOWNSTREAM EFFECTS

The Kiltyclogher Community Council is concerned about the interaction between peat, drainage, steep terrain, groundwater and construction.

The source material records peat depths of up to approximately **4.5 metres in the north and 1.8 metres in the south** and identifies inconsistencies between the ground information and subsequent conclusions concerning peat stability.

The Council considers that peat stability cannot be treated as an isolated geotechnical issue.

Peat failure or mobilisation could interact with:

- natural drainage;
- artificial drainage;
- steep slopes;
- headwater streams;
- groundwater;
- karst;

- road crossings; and
- downstream aquatic receptors.

The source material identifies potential pathways towards both the Lough Melvin and Lough Gill systems.

The Council therefore considers that the Board must assess the **complete peat–hydrology–construction system**, rather than individual peat locations in isolation.

Construction-stage monitoring cannot substitute for establishing the suitability and environmental acceptability of the proposed locations before permission.

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12. DOUGH AND THUR MOUNTAINS NHA AND PRIORITY HABITATS

The source material identifies:

- H7130 blanket bog;
- priority H7130* active blanket bog;
- priority H8240* limestone pavement; and
- deep bog depressions presumed to be sinkholes.

The habitat-condition assessment was based upon three zones selected by the applicant and a two-day survey undertaken in September 2024, with acknowledged limitations including the possibility that small or concealed habitats were missed and that late-season survey conditions could underestimate limestone-pavement flora.

The Council considers that these limitations are material because they relate to priority habitats and possible karst features.

The fact that the Dough and Thur Mountains NHA is legally different from an SAC does not mean that it can be ignored for EIA purposes.

The NHA forms part of the same wider mountain, peat, drainage and ecological system.

Environmental pathways do not stop at ownership boundaries.

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13. AQUATIC ECOLOGY AND FISH

The source material identifies sensitive aquatic receptors including:

- White-clawed Crayfish;(its concentrated population at the OwenBeg river touch points with the Grid}
- salmonids;
- aquatic invertebrates;
- fish spawning habitat; and
- fish nursery habitat.

It also identifies concerns regarding current-layout fish data, inaccessible crossings and incomplete aquatic baseline coverage.

The Council considers that aquatic assessment must be sufficiently representative of the actual proposed works.

A limited survey taken under particular weather, flow or seasonal conditions cannot necessarily establish the complete baseline condition.

This is particularly important where the assessment seeks to exclude impacts on protected waters.

The Council therefore submits that missing or incomplete baseline evidence cannot simply be cured through a future construction monitoring programme.

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14. WFD ASSESSMENT AND THE 32 KM ROUTE

The Kiltyclogher Community Council is concerned that the Grid Connection Route was screened out of detailed WFD assessment based on the limited nature of individual work areas.

The source material identifies an approximately 32 km project involving:

- 11 bridge crossings;
- 10 HDD crossings;
- 30 separate HDD bores;
- eight culvert crossings;
- approximately 920 m within Lough Gill SAC; and
- additional crossings draining towards the SAC.

The Council considers that these characteristics make a route-wide and catchment-based assessment necessary.

The environmental mechanism does not change merely because individual work fronts are separated geographically.

Sediment released at one location may travel downstream.

Groundwater may travel beneath planning boundaries.

Drainage may connect several work areas.

The cumulative effect must therefore be assessed according to the actual hydrological system.

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15. TOURISM, LANDSCAPE AND SCENIC AMENITY

The Kiltyclogher Community Council considers that tourism is an important dimension of the assessment which deserves greater weight.

Kiltyclogher has a tourism potential but depends upon the quality of its **water, scenery and rural landscape**.

Visitors are attracted by:

- clean and attractive lakes and rivers;
- good scenery;
- quiet rural roads;
- upland landscapes;
- walking;

- cycling;
- landscape trails;
- fishing;
- wildlife;
- nature-based recreation; and
- the overall experience of a high-quality rural environment.

The Kiltyclogher Community Council considers that **pristine water and good scenery are economic assets**.

They support the area's attractiveness to visitors and underpin tourism-related activity.

The Council therefore considers that landscape and water quality should not be treated solely as environmental matters.

They are also matters of **community economic resilience and long-term tourism potential**.

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16. THE VISITOR EXPERIENCES THE COMPLETE LANDSCAPE — NOT PLANNING APPLICATION BOUNDARIES

The proposed Wind Farm and Grid Connection will be experienced as one development by residents and visitors.

A walker does not experience the turbines separately from the cable route.

A cyclist does not experience construction traffic separately from the substation.

A visitor does not experience Lough Gill separately from the scenery surrounding it.

A person fishing or walking beside a river does not distinguish between a Wind Farm application and a Grid Connection application.

The Council therefore considers that the cumulative landscape and visitor experience must be assessed across the **complete development**.

The potential combined effects include:

- turbines;
- substations;
- Grid Connection infrastructure;
- construction compounds;
- access tracks;
- excavation;
- vegetation clearance;
- construction traffic;
- noise;
- watercourse crossings; and
- associated temporary and permanent works.

The Council considers that these effects could materially alter the character and experience of the landscape used by residents and visitors.

17. WALKING, CYCLING AND LANDSCAPE TRAILS

Walking, cycling and landscape-based recreation depend upon more than the existence of a formal trail. We have currently been involved with trails in our area, supporting our Holiday Centre. Trails including Deans Lake Trail (Outdoor recreation Infrastructure-Leitrim County Council and a cross border Scottish woodlands project heritage trail at the edge of our village. We have many established cycling trails on Dough Mountain and we have plans to further develop these trails including a Heritage Trail traversing the mountain to connect with the Leitrim Way at Skreeney, Manorhamilton. This would be severely compromised by the massive14 by185metre proposed wind turbines at Lissinagroagh windfarm, the Grids Substation, the 100metre mast and a secondary 23 metre mast which are not in the Montague. These developments combined with Faghary windfarm with its 3 by 125 metre turbines would have a detrimental effect on our tourism which is our viiages main source of economy.

They depend upon:

- attractive scenery;
- tranquillity;
- clean water;
- safe roads;
- visual coherence;
- access;
- natural character; and
- a high-quality visitor experience.

The Kiltyclogher Community Council therefore requests that the Board consider the effects of the complete development upon the **experience of travelling through and recreating within the landscape**, rather than limiting assessment to conventional visual receptors.

The approximately 32 km linear nature of the Grid Connection means that construction activity will affect numerous local roads, communities, waterways and recreational settings.

Even where individual construction activities are temporary, the cumulative experience extend over a substantial period and geographical area.

18. TOURISM AND WATER QUALITY

The Kiltyclogher Community Council considers that water quality and tourism are directly related.

The area's lakes and rivers contribute to:

- scenic amenity;

- fishing;
- outdoor recreation;
- biodiversity;
- walking and cycling;
- nature-based tourism; and
- the identity of the wider area.

A deterioration in water quality, visible sedimentation, pollution or damage to the landscape setting of waterways will undermine the perception of the area as a high-quality outdoor destination.

The Council therefore considers that the environmental assessment should expressly recognise the potential economic and community consequences of impacts upon water quality and scenery.

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19. CONSTRUCTION TRAFFIC AND ROAD SAFETY

The Kiltyclogher Community Council is concerned about the implications of construction traffic on local roads.

The source material identifies that the Stage 1 Road Safety Audit related principally to Wind Farm access junctions rather than demonstrating a route-wide Road Safety Audit for the approximately 32 km Grid Connection.

The audit nevertheless identified:

- narrow roads;
- steep junction gradients;
- widening requirements;
- vegetation and visibility issues;
- potential overturning hazards;
- drainage/flooding concerns; and
- visibility and geometry concerns.

The Council considers that these findings demonstrate the importance of route-wide assessment.

The Grid Connection will interact with local roads used by:

- residents;
- farmers;
- school traffic;
- pedestrians;
- cyclists;
- visitors; and
- tourism traffic.

The Kiltyclogher Community Council therefore considers that the absence of a demonstrated route-wide assessment is a material deficiency.

20. INCOMPLETE PROJECT DEFINITION

The Council is concerned that important aspects of the final Grid Connection remain subject to future detailed design and investigation.

The source material identifies:

- discrepancies in route-length descriptions;
- final HDD launch and reception positions remaining subject to detailed investigation;
- future road-condition surveys;
- future confirmatory otter surveys;
- traffic-management updates;
- future micro siting; and
- unresolved drawing/document-control issues.

The Kiltyclogher Community Council accepts that minor detailed design matters can appropriately be refined after consent.

However, where the future information could determine:

- the location of works;
- land take;
- watercourse crossings;
- ecological effects;
- groundwater interaction;
- access;
- construction methods; or
- the requirement for redesign,

the matter is no longer simply a minor technical detail.

The environmental implications must be sufficiently understood at consent stage.This planning application has failed to do so and the planning application must be refused.

21. ENVIRONMENTAL STUDY AREAS MUST FOLLOW ENVIRONMENTAL PATHWAYS

The Kiltyclogher Community Council believe that some study areas appear to be narrowly associated with the physical cable corridor.

The source material identifies the need for route-specific assessment extending sufficiently to identify:

- connected watercourses;
- groundwater pathways;
- bridges;
- culverts;

- riparian habitat;
- hedgerows;
- trees;
- buildings;
- protected species;
- archaeological features;
- private wells;
- access constraints; and
- cumulative effects.

The Kiltyclogher Community Council submits that the appropriate study area must depend upon the environmental receptor and pathway.

A groundwater assessment requires a different geographical scale from a cable trench.

A river assessment requires consideration of downstream receptors.

A landscape assessment requires consideration of visual relationships.

A Natura 2000 assessment requires consideration of the relevant ecological pathways and conservation objectives.

The Council therefore considers that the use of a narrow application corridor cannot establish that effects outside it do not exist and therefore the planning application must be refused

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22. PUBLIC PARTICIPATION

The Kiltyclogher Community Council is concerned about the timing and lack of public participation. We are directly affected by the project but the developers did not provide our community any opportunity to consult and inspect the project plans, as was the case in Rossinver, and even then, it was by appointment only, in an isolated location. In the case of this planning application where the grid is from the substation to Dromahair, there has been no consultation regarding this grid application, other than the only by appointment application that was associated with the Lissinagroagh windfarm application.

The Wind Farm application was lodged in May 2026, whereas the Grid Connection application entered statutory public inspection only from August 2026.

The Grid Connection extends approximately 32 km through multiple townlands, roads, watercourses and communities.

The Council considers that meaningful participation requires the public to be able to understand the **complete project and its environmental consequences**.

The separation of the two applications makes this more difficult.

This is particularly important where the Grid Connection is fundamental to the operation of the Wind Farm.

A period of statutory inspection after the Wind Farm application has already been lodged is not necessarily equivalent to early, route-wide consultation concerning the final integrated project.

The Council therefore considers that the public-participation issue reinforces the need for a complete and transparent assessment of the integrated project.

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23. INVASIVE ALIEN SPECIES

The source material identifies records of:

- Japanese knotweed;
- Himalayan balsam; and
- Rhododendron,

including locations relevant to the Grid Connection and Lough Gill SAC.

The route involves substantial excavation, soil movement, machinery and spoil handling.

The Council considers that generic biosecurity procedures should not substitute for demonstrating that the proposed route can be constructed without spreading invasive species. Taking in to account some material from the Grid trench is to be transported to the borrow Pits on Dough Mountain.

The assessment should address:

- contaminated soil;
- machinery;
- spoil;
- wash water;
- storage;
- transportation;
- fragments and propagules; and
- disposal.

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24. CUMULATIVE EFFECTS — THE WHOLE PROJECT

The Kiltyclogher Community Council submits that the cumulative effects of the complete development must be considered.

This is required not only by the general principles of EIA but is particularly important under Article 6(3) of the Habitats Directive. The CJEU ruled that **mitigation measures cannot be used at the screening stage** to bypass a full Appropriate Assessment.

European Commission guidance expressly states that cumulative impacts can arise from successive, incremental and combined effects and that geographic boundaries for cumulative assessment may differ according to the impact being assessed, including water-resource effects.

The Council therefore considers that the Board should assess cumulative effects upon:

- European Sites;
- rivers;
- lakes;
- groundwater;
- drinking water;
- peat;
- aquatic ecology;
- landscape;
- tourism;
- recreation;
- roads;
- communities; and
- public health and amenity.

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25. THE PRECAUTIONARY PRINCIPLE

The Kiltyclogher Community Council does not contend that every identified pathway will necessarily result in significant damage.

The Council's submission is more fundamental:

Where a credible pathway to a sensitive receptor exists, and the applicant has not provided sufficient scientific evidence to establish its nature, magnitude and consequences, the uncertainty cannot simply be assumed away.

This is particularly important for:

- Lough Gill SAC;
- Lough Melvin SAC;
- drinking-water resources;
- karst groundwater;
- peat stability;
- aquatic habitats; and
- other European Sites.

The European Commission's Article 6 guidance recognises that where sufficient information does not exist or is outdated, additional information may be required and the precautionary principle applies where uncertainty remains.

The Council therefore considers that the burden is not met merely by proposing monitoring after construction begins.

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26. CONDITIONS CANNOT SUBSTITUTE FOR FUNDAMENTAL ASSESSMENT

The Kiltyclogher Community Council recognises that planning conditions can appropriately regulate matters of detail.

However, conditions should not be relied upon to answer fundamental questions such as:

- Where exactly will a crossing be located?
- What groundwater pathway exists?
- Where will contaminated water travel?
- What is the stability of the peat?
- What habitats occur in the affected area?
- What is the complete hydrological connection to a European Site?
- What is the effect on a drinking-water catchment?
- What land is ultimately required?
- What construction method will be used?
- What mitigation is required?

The source material identifies several of these matters as remaining subject to future investigation or detailed design.

The Council considers that where the answers could materially change the assessment or design of the project, they should be established before consent.

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27. THE CASE FOR REFUSAL

The Kiltyclogher Community Council's objection is cumulative.

No single issue needs to be considered in isolation.

The material deficiencies interact.

For example:

Karst + groundwater + construction → potential pathway to Lough Gill.

Peat + drainage + steep terrain → potential sediment pathway to downstream waters.

Grid Connection + Wind Farm → cumulative environmental effects.

European Sites + incomplete baseline information → unresolved Appropriate Assessment uncertainty.

Drinking-water catchment + groundwater uncertainty → public-health and water-security concern.

Wind Farm + Grid Connection + landscape infrastructure → cumulative tourism and visual effects.

32 km route + construction traffic + local roads → route-wide community and road-safety effects.

Deferred surveys + detailed design + future micrositing → uncertainty concerning the actual environmental footprint.

The right for a village to maintain its tourism and economy.

The Kiltyclogher Community Council therefore considers that the deficiencies cannot reasonably be characterised as minor matters capable of being resolved through standard conditions.

28. OVERALL CONCLUSION

Kiltyclogher Community Council respectfully submits that the proposed Lissinagroagh Grid Connection has not been demonstrated to be environmentally acceptable.

The Council's position is based upon the following principal considerations:

A. INTEGRATED PROJECT

The Wind Farm and Grid Connection are functionally interdependent and must be assessed as the complete project.

The principle arising from **O'Grianna** is directly relevant to avoiding project splitting and ensuring that the environmental effects of the grid connection are assessed as part of the overall development.

B. EUROPEAN SITES

The project has potential implications for SACs and SPAs, including **Lough Gill SAC and Lough Melvin SAC**.

The NIS itself identifies European Sites where adverse effects could not be excluded without mitigation.

C. LOUGH GILL

Approximately 920 metres of the Grid Connection lies within Lough Gill SAC, with associated watercourse crossings and additional crossings draining towards the SAC.

D. DRINKING WATER

Lough Gill is our only source of drinking water and the village has a new water treatment plant with an ability to cater for 500 houses, one of only a few communities with a surplus water supply compared to most locations in Co Leitrim. We have invested a large part of our time to build and promote our villages infrastructure. This development will threaten the future of our communities. The wind farm will be a prominent development overlooking the village. Directive (EU) 2020/2184 requires risk assessment and risk management of catchment areas for drinking-water abstraction points, including consideration of runoff, recharge, hazards and risks to drinking-water quality.

E. WATER FRAMEWORK DIRECTIVE

The Water Framework Directive requires protection against deterioration of water bodies.

F. KARST AND GROUNDWATER

The documented local karst conditions and approximately one-kilometre Polldough dye-trace demonstrate that underground transport occurs within the area, while equivalent investigation towards the Owenmore/Lough Gill system has not been demonstrated.

G. LOUGH MELVIN

The potential Sraduffy River → Kiltyclogher → County River → Lattone River → Lough Melvin pathway represents a material potential downstream receptor relationship.

H. PEAT

The evidence concerning peat depths, drainage and stability is not sufficiently resolved to eliminate concern about downstream consequences.

I. AQUATIC ECOLOGY

The baseline aquatic evidence contains material limitations, including current-layout fish-data gaps and inaccessible crossing locations.

J. TOURISM AND LANDSCAPE

The area's clean water, scenery, walking, cycling, landscape trails, fishing and outdoor recreation are important community and tourism assets.

K. ROADS AND COMMUNITY

The scale of the Grid Connection requires route-wide consideration of road safety and construction traffic, rather than reliance solely upon individual Wind Farm access assessments.

L. PUBLIC PARTICIPATION

The public should be able to understand the complete project and its environmental consequences, particularly where the Grid Connection is fundamental to the Wind Farm.

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29. FORMAL REQUEST TO AN COIMISIÚN PLEANÁLA

For all the reasons set out in this submission, **Kiltyclogher Community Council respectfully requests that An Coimisiún Pleanála refuse permission for the proposed Lissinagroagh Grid Connection, VA12.324597 / ACP-324597-26.**

In particular, the Council requests that the Board find that the submitted information does not provide a sufficiently complete and reliable basis to exclude significant adverse effects upon:

- Lough Gill SAC;
- Lough Melvin SAC;
- other relevant European Sites;
- surface waters;
- groundwater;
- drinking-water resources;
- aquatic ecology;
- peatland and associated habitats;
- landscape character;
- tourism and recreation;
- local communities and specifically the threat to Kiltyclogher’s economy
- road users.

The Council further requests that the Board have regard to the **Habitats Directive 92/43/EEC, Birds Directive 2009/147/EC, Water Framework Directive 2000/60/EC**

and Drinking Water Directive (EU) 2020/2184, together with the applicable Irish implementing legislation.

The Council submits that the environmental assessment must follow the actual ecological, hydrological and groundwater pathways associated with the **complete integrated project**, rather than the administrative boundaries of separate applications.

The Council considers that **clean water, protected rivers and lakes, good scenery, landscape character, walking and cycling opportunities, landscape trails, fishing and outdoor recreation are important community and economic assets**.

The Council therefore considers that the proposed development should not be permitted where material uncertainty remains concerning its potential effects upon those assets and upon protected European Sites.

Kiltyclogher Community Council respectfully requests refusal of the application.
