Submitted by: Nuala McNulty & Paul Keogh
Tawnylust, Manorhamilton, Co. Leitrim F91 F8Y8

8/10/2026

To; An Coimisiún Pleanála

Current grid application: VA12.324597 / ACP-324597-26
Related wind farm application: PAX12.324290 / ACP-324290-26

Re; Proposed Development of a 110 kV Substation located in the townland of Faughary, Co. Leitrim, and a Grid Connection Route spanning across 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.

Dear Sir/Madam,

We wish to lodge our submission and call for the rejection of planning permission for the above project.

Our right to inspect the documents and participate

We object at the outset to the practical barriers to exercising our right to inspect the application documents and make an informed observation on this development. We had only seven weeks' notice that the grid proposal was happening. We live on the Kiltyclogher–Manorhamilton Road beside the proposed T14 turbine location and, together with our neighbours rely on Net1 broadband and were not consulted about the grid connection.

Our right to inspect the plans, EIAR, NIS and supporting reports must be meaningful in practice. The grid application documents were available for local physical inspection only in Carrick-on-Shannon, 60Km away. By contrast, the wind farm EIAR had been available for inspection in Manorhamilton Library, local to us. The grid documents were not made available there. The requirement to travel to Carrick-on-Shannon imposed a substantially longer journey during the seven-week period available to examine this large and technically complex application.

The seven-week notice period was our first opportunity to consider the grid proposal, its proposed telecommunications remedy and the assessment on which it relies. Online publication did not replace direct consultation or accessible local inspection. We request that the Commission consider these barriers to informed participation, together with our specific concerns about Net1 service, bat habitat in close proximity to our house and slippage associated with T14 and the borrow pit.

1 Request for refusal

We object to the proposed Lissinagroagh 110 kV substation and grid connection to Srananagh and request refusal of permission. We are Net1 broadband customers at the address above. The effect of the overall project on the network serving our home is a direct concern to us. The application has not demonstrated that the proposed telecommunications remedy will protect our existing service.

This observation concerns the current grid application. We understand that the wind farm application has already been lodged and that its observation period has passed. I refer to the turbines where necessary to

explain the interference that the grid application's telecommunications infrastructure is intended to address, and the adequacy of the shared environmental assessment.

The applicant describes the wind farm and grid connection as functionally interdependent parts of one project and relies on the same Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) for both applications. The Commission must therefore examine whether those reports adequately assess the development now before it, including the permanent substation, mast, cable route, crossings and associated works.

2 Net1 interference and an unproven remedy

The telecommunications evidence identifies interference concerns involving T13 and the Dough Mountain to O'Donnell's Rock radio link. The grid application includes a telecommunications mast up to 23 m above ground. The existence of a proposed remedy does not establish that it is technically effective or that every affected customer's service will be maintained.

Net1 correspondence brought to our attention distinguishes licensed point-to-point links from the unlicensed equipment delivering broadband to individual customers. It records expected effects on coverage and uncertainty over the extent of effects on the customer-delivery network. These are different questions: addressing one identified radio link does not demonstrate protection of the complete network serving homes and businesses.

The Commission should obtain Net1's current written technical position and examine the underlying correspondence. Consultation with an operator, or a commitment to pay for mitigation, is not equivalent to the operator confirming that the submitted design resolves the interference.

3 Protection of our existing broadband service

The EIAR must identify the affected service area and explain the consequences for customers. The application should establish whether our property is served by an affected link or access point, what change in coverage or performance is predicted, and how service will be maintained during construction and operation. An unspecified future arrangement does not answer those questions.

Before relying on the proposed mast, the Commission should require the relevant network diagrams, interference modeling and link calculations; confirmation of the mast's precise purpose and equipment; and Net1's written assessment of whether the proposed arrangement protects both the affected backhaul links and customer connections. The evidence should address the operating turbine array and the final mast design, rather than an earlier layout.

Any proposed fibre or satellite replacement must be assessed at the individual property. Its availability, installation requirements, speed, latency, reliability, capacity, installation cost and ongoing charges must be established. There must also be a clear explanation of who pays, who maintains the replacement, the duration of any interruption and what happens if the alternative is unavailable. A suggestion that another technology can be offered is not evidence of an equivalent service.

The applicant has not demonstrated, through a clear customer-specific assessment, that our existing Net1 service will be protected. We object to granting permission on the assumption that this unresolved issue can be settled after consent.

4 The mast requires its own environmental assessment

The mast is an express component of the grid application. Its presence in the project description does not by itself demonstrate assessment of its effects. The EIAR must identify its landscape and visual effects, associated lighting and equipment, construction requirements and relevant bird effects, including its potential use as a perch and interaction with the turbines.

If resolving the Net1 issue requires a different mast, additional relay equipment or works outside the submitted footprint, the consequences of that solution must be assessed before it is relied upon. Permission should not depend on a technical solution whose necessary infrastructure and environmental effects remain unidentified.

Broadband interference is principally an EIAR and planning issue. My objection to the NIS concerns the ecological evidence, pathways to European sites and the adequacy of mitigation. If the telecoms remedy requires additional works with relevant ecological effects, those works must also be considered in the appropriate assessment.

5 Incomplete aquatic baseline for the grid route

The route is approximately 32 km long and includes eleven bridge crossings and eight culvert crossings by open trenching. These are substantial works with identifiable pathways to rivers and connected habitats. They require evidence specific to the actual crossings and working areas.

The aquatic material records incomplete access at six grid survey locations. Some locations were observed from roads or boundaries, so we do not describe all six as wholly unsurveyed. The material objection is incomplete access and incomplete baseline coverage. At Site 23, the stream could not be properly accessed or viewed and substrate, macrophytes, macroinvertebrates and invasive species could not be recorded.

The earlier 2021 electrofishing work concerned an earlier layout, with most locations not overlapping the current survey sites. It does not establish the aquatic conditions at every crossing on the final route. Missing information must not be treated as evidence that a watercourse has low ecological value or that generic mitigation will be sufficient.

6 Water protection and the reliability of the NIS

The grid route was screened out of detailed Water Framework Directive assessment on the basis of limited or negligible risk. That conclusion needs to be justified against the actual route, its repeated water crossings, off-road working areas and connections to sensitive downstream waters, including Lough Gill SAC.

Trenching, drilling, dewatering and exposed soil create pathways for sediment or other pollutants to enter watercourses. The assessment must explain the risks and the effectiveness of the proposed controls at each relevant location, including drilling-fluid escape, difficult access and adverse weather. A general construction method does not establish the condition of an inaccessible stream or the suitability of a particular crossing.

The NIS must support a conclusion on the integrity of the affected European sites using adequate ecological information and sufficiently defined mitigation. Incomplete baseline coverage and unresolved crossing arrangements weaken that conclusion. We request refusal where the Commission cannot establish the necessary certainty from the evidence before it.

7 Deferred design and public scrutiny

The documents leave further road-condition, crossing, obstruction and construction details to later investigation. The Commission must distinguish routine construction detail from information necessary to identify and assess effects. The locations and footprints of joint bays, drilling launch and reception pits, compounds, spoil storage and associated access are material where they change habitats, drainage, traffic or effects on nearby properties.

The assessment also needs to show that all chapters address the same final route. The 30.6 km public-road section is compatible with an approximately 32 km total and is not, by itself, an error. The earlier

33.5 km route and the approximately 36.5 km figure in the noise material require reconciliation, with an explanation of whether different alignments or assessment stages were used.

8 Connected ground conditions and emergency access

At the substation end, the assessment must address relevant peat, karst, drainage and adjoining upland ground wherever those conditions can affect the grid infrastructure or connected waters. An ownership boundary does not contain runoff or sediment. The common EIAR must assess relevant combined excavation and drainage effects rather than treating the grid and turbine boundaries as physical barriers.

Monitoring and emergency response must be workable. A promise of inspection does not demonstrate that downstream sampling or pollution control can be carried out where access has not been secured. The Commission should examine the access arrangements, response times and practical measures on which the applicant relies. Daily inspections cannot replace an adequate assessment of rapid runoff, drainage failure or ground movement.

9 Our home beside T14 and bats behind our house

We live beside the proposed T14 location. Bats are present behind our house. This is a firsthand local observation identifying a sensitive ecological receptor close to the proposed development. The applicant must establish whether this location includes a roost and how the bats use the surrounding habitat, including their commuting and feeding routes.

The shared EIAR must demonstrate that these bats and the habitat behind my house were adequately considered. It should identify the surveys undertaken, their locations and timing, the relationship to T14 and associated works, and the evidence supporting the proposed mitigation. Where relevant, it must also assess effects from the substation, lighting, vegetation removal, access works and cable construction. General statements about bats do not establish that this particular location has been assessed.

I am also afraid of ground or peat slippage associated with T14 and the borrow pit, and of the consequences for my home, access and surrounding land. The applicant must demonstrate the relationship between the proposed excavations, slopes, peat, groundwater and drainage and the position of my property. The EIAR must assess excavation and drainage changes together, including the effects of heavy rainfall and the practical means of preventing material from moving towards occupied homes or connected watercourses.

These concerns are relevant to this grid observation because the applicant relies on a common assessment of one functionally interdependent project. The Commission should establish whether the risks to our property and the bats behind it have been properly addressed in that assessment and whether any relevant pathways also affect the grid infrastructure or waters considered in the NIS. I request that this local evidence be brought to the attention of the wind farm case team. Our observations do not establish a particular underground connection or prove that slippage will occur; they identify site-specific receptors and risks that require adequate evidence before consent.

10 Road works and effects on residents

The approximately 32 km route entails extensive works along public roads, bridge approaches and residential frontages. The EIAR should clearly identify affected receptors and assess construction noise, traffic, diversions, property access and emergency access against the final working arrangements. Those effects must be considered together with other relevant construction activity, rather than left to an unspecified traffic plan after consent.

11 Lack of consultation with local residents

We were not consulted about the grid connection and knew nothing about the grid proposal. As local residents and Net1 customers, we should have been given clear information about the proposed works,

The publication of application documents does not answer our concern about the lack of direct engagement with residents. We were not given an opportunity through such engagement to explain our reliance on Net1, identify our property as a potentially affected customer location or question whether the proposed telecommunications remedy would protect our service. Interference with such service would be hugely detrimental to our businesses.

This lack of consultation reinforces the concern that the assessment has not adequately identified affected households or examined the consequences for individual customers. The Commission should examine what consultation actually took place with residents along this road and how their broadband, access and construction concerns were incorporated into the EIAR. We request that this failure be considered alongside the unresolved Net1 impacts and the other grounds for refusal.

12 Coordination of the two applications

We request that the grid case team formally notify the wind farm case team of the Net1 interference issue, the proposed telecommunications remedy and the deficiencies identified in the shared EIAR and NIS. We also request that this observation be placed before the officers and inspector dealing with the related wind farm application, subject to the applicable procedure.

This request is particularly relevant because the grid application contains infrastructure intended to address interference arising from the turbines. The separate case references should not prevent material evidence on one file from being considered in the assessment of the connected project. Any material new or revised environmental information should be made available for public scrutiny through the applicable process.

13 Conclusion

We request refusal of the grid connection and substation application. The applicant has not demonstrated that its telecommunications remedy will protect the Net1 network serving my home, and the shared EIAR and NIS contain material gaps concerning the final grid route, aquatic baseline, water protection, crossing design and practical mitigation. The evidence must also address our home beside T14, the bats behind our house and the ground-stability concerns associated with T14 and the borrow pit.

These concerns require evidence before a decision, not assurances that missing information or an effective broadband solution will be obtained later. The Commission should not grant permission unless the development and its effects have been adequately assessed. On the information presently available, we submit that permission should be refused.

Yours faithfully,

Signed: *Nuala McNulty & Paul Keogh*

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